

Before the  
**COPYRIGHT ROYALTY JUDGES**  
The Library of Congress

*In re*

**DISTRIBUTION OF CABLE  
ROYALTY FUNDS**

**Docket No. 16-CRB-0009-CD (2014-2017)**

**DISTRIBUTION OF SATELLITE  
ROYALTY FUNDS**

**Docket No. 16-CRB-0010-SD (2014-2017)**

**SETTLING DEVOTIONAL CLAIMANTS' MOTION TO DISALLOW  
MULTIGROUP CLAIMANTS' CLAIMS**

***PUBLIC REDACTED VERSION***

Date: May 4, 2022

Respectfully submitted,

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<b><u>Exhibit #</u></b>	<b><u>Document</u></b>
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Ex. 2 .....	MGC Assumed Name Record (Jan. 20, 2015)
Ex. 3 .....	WSG Transfer (Dec. 31, 2017)
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Ex. 10 .....	MGC Response to SDC Discovery Requests (Feb. 18, 2022)
Ex. 11 .....	Salem Baptist Agreement (July 31, 2002) [Restricted]
Ex. 12 .....	Abney Decl. (Nov. 22, 2014) [Restricted]
Ex. 13 .....	Nye Declaration (May 4, 2022)
Ex. 14 .....	IWV Forfeiture (July 24, 2009)
Ex. 15 .....	IWV Filing History with Texas Secretary of State
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Ex. 18 .....	Warley Declaration (May 4, 2022)
Ex. 19 .....	Lutzker Declaration (May 4, 2022)

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<b>DISTRIBUTION OF CABLE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0009-CD (2014-2017)</b>
<b>DISTRIBUTION OF SATELLITE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0010-SD (2014-2017)</b>

**SETTLING DEVOTIONAL CLAIMANTS’ MOTION TO DISALLOW  
MULTIGROUP CLAIMANTS’ CLAIMS**

The Settling Devotional Claimants (“SDC”) move to disallow claims asserted by Worldwide Subsidy Group LLC (“WSG”), aka Independent Producers Group (“IPG”), aka Multigroup Claimants’ (“MGC” or “MC”).

MGC’s claims for seven claimants in the devotional category should be dismissed in their entirety because MGC has failed to meet its burden to show it has current authority to represent those claimants or that past representational authority granted to WSG persists following MGC’s failure to file royalty claims in 2014. Given MGC’s and WSG’s past history of misconduct and MGC’s continued filing of unauthorized and false claims in these proceedings, none of MGC’s claims are entitled to any presumption of validity and fall in the absence of affirmative evidence of representational authority. There are also deficiencies in MGC’s evidence that warrant dismissal of the claims made on behalf of Salem Baptist Church of Chicago, Inc. (“Salem Baptist”), IWV Media Group, Inc. (“IWV”), and Jack Van Impe Ministries International (“Jack Van Impe”).

## **I. BACKGROUND**

### **A. History of WSG, IPG, and MGC in Copyright Royalty Proceedings**

The persons and organizations associated with the entity currently participating in these proceedings under the name “Multigroup Claimants” comprise a confusing jumble of names, dates, and affiliations, but the individual at the center of it all is Raul Galaz, who is well-known in copyright royalty proceedings.<sup>1</sup> Raul Galaz was the founder of WSG, which adopted the “doing business as” name of IPG in copyright royalty proceedings. As the Judges have repeatedly explained, “Mr. Galaz was previously convicted and incarcerated for fraud in the context of copyright royalty proceedings, ... Mr. Galaz also admittedly lied in a cable distribution proceeding.” *E.g.*, Distribution of 2000-03 Cable Royalty Funds, 78 F.R. 64984, 65000 (Oct. 30, 2013). Raul Galaz continues to conduct the business of today’s iteration of WSG, which confirmed in these proceedings that “all WSG-related entities have participated in these proceedings with the identical legal counsel and personnel” over the years. MGC’s Replies in Support of Motion for Partial Distribution of 2015-17 Royalties, Dkts. 16-CRB-0009-CD (2017-17) & 16-CRB-0010-SD (2014-17), at 2 (Aug. 13, 2021) (“**2014-17 MGC Replies**”).

After the commencement of the 2010-13 royalty proceedings, IPG claimed it had assigned the rights to pursue claims it had filed for 2010-13 to MGC in January 2015, although it turned out that “MGC” was nothing more than an assumed name of Raul Galaz’s father, Alfred Galaz. Ex. 1, WSG-MGC Transfer (Jan. 20, 2015); Ex. 2, MGC Assumed Name Record (Jan. 20, 2015). Following the assignment to Alfred Galaz (using the name MGC), neither MGC nor

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<sup>1</sup> A 2020 ruling contained a summary of some of this cast of characters. *See* Order on Order to Show Cause, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13), at 2-3 (June 12, 2020).

WSG filed claims in July 2015 for any of WSG’s claimants for royalty year 2014.<sup>2</sup> After this extraordinary and unexplained gap, claims for 2015 and 2016 were filed for the first time by Alfred Galaz under the alias MGC.

According to documents submitted to the Judges, Alfred Galaz transferred 100% ownership of WSG to his grandson Ryan Galaz (Raul Galaz’s son) on December 31, 2017, and transferred 100% ownership of MGC to Ryan Galaz on the next day, January 1, 2018. Order on Order to Show Cause, Dkt. 14-CRB-0010-CD/SD (2010-13), at 5-6 (June 12, 2020); Ex. 3, WSG Transfer (Dec. 31, 2017); Ex. 4, MGC Transfer (Jan. 1, 2018).<sup>3</sup> Ryan Galaz then transferred MGC to WSG via an instrument retroactive to January 1, 2018, Ex. 5, Ryan Galaz Transfer (Oct. 14, 2020), and “MGC” is now another assumed name of WSG. Ex. 6, MGC Assumed Name Certificate (Jan. 6, 2020).

As a result, right now, references to WSG, IPG, and MGC apparently all refer to the same entity that Raul Galaz founded and which participated in copyright royalty proceedings through royalty year 2009. However, if the transfer documents are to be believed, then MGC’s claims in these proceeding were actually filed by two *different* entities: First, the individual Alfred Galaz filed 2015 and 2016 claims (using the name MGC); and then, the company WSG filed 2017 claims (also using the name MGC). Still, the “identical personnel” (in particular, Raul Galaz and WSG’s counsel) have remained the common thread for “all WSG-related entities” in all their iterations and proceedings. 2014-17 MGC Replies, at 2.

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<sup>2</sup> This failure to file is not explained in MGC’s discovery production or responses, resulting in the SDC’s outstanding motion to compel. *See* SDC Motion to Compel MGC to Produce Documents, Dkts. 16-CRB-0009-CD (2014-17) & 16-CRB-0010-SD (2014-17) (Mar. 14, 2022).

<sup>3</sup> These transactions are being challenged as fraudulent conveyances by the trustee of Alfred Galaz’s bankruptcy estate. Adversary Complaint, *Soule v. Galaz (In re Galaz)*, No. 21-01017-M (Bankr. N.D. Ok. May 27, 2021).

**B. MGC is Only an Agent of Copyright Owners, Not an Owner or Claimant Itself**

The Judges have long held that WSG/IPG/MGC is an agent in copyright royalty proceedings, not a copyright owner. *See, e.g.*, Ruling and Order Regarding Claims, Dkt. 2008-1 CRB CD 98-99 (Phase II), at 12 (June 18, 2014) (“**1999 Claims Ruling**”) (“The Judges ... view IPG as a ‘designated agent.’”); Memorandum Opinion and Order Following Preliminary Hearing on Validity of Claims, Dkt. 2008-2 CRB CD 2000-2003 (Phase II), at 2 (Mar. 21, 2013) (“**2000-03 Claims Ruling**”); Memorandum Opinion and Ruling on Validity and Categorization of Claims, Dkts. 2012-6 CRB CD 2004-09 (Phase II) & 2012-7 CRB SD 1999-2009 (Phase II), at 6 (Mar. 13, 2015) (“**2004-09 Claims Ruling**”); Ruling and Order Regarding Objections to Cable and Satellite Claims, Dkts. 14-CRB-0010-CD (2010-13) & 14-CRB-0011-SD (2010-13), at 12-13 (Oct. 23, 2017) (“**2010-13 Claims Ruling**”).

As an agent, MGC must establish that its authority to file existed prior to each year’s claims filing deadline, because filed claims must contain a “declaration of authority to file the claim and a certification of the veracity of the information contained in the claim and the good faith of the person signing in providing the information.” 37 C.F.R. §§ 360.4(b)(1)(v), (2)(v). MGC’s “representational authority turns on a factual inquiry into ‘whether the claimant intended for its claim to be filed on its behalf by another.’ Such intent must be expressed prior to the filing of the relevant claim.” *Settling Devotional Claimants v. Copyright Royalty Board*, 797 F.3d 1106, 1115 (D.C. Cir. 2015). The question is “whether the claimant intended for its claim to be filed on its behalf by another ... at the time the claim was filed.” 2000-03 Claims Ruling, at 4.

**C. WSG Representation Agreements and Document Production**

According to MGC, its authority in these proceedings traces back to agreements executed with WSG between 1998 and 2002. 2014-17 MGC Replies, at 2 (“*all* of the represented

copyright claimants have been represented vis-à-vis agreements entered into with WSG”). In general,<sup>4</sup> WSG entered into two types of agreements: either a “Representation Agreement” that contained an indefinite term, or a “Mandate Agreement” that granted WSG an exclusive right to collect royalties, but for one year only. Both could be terminated upon written notice, and the termination would take effect “one semi-annual period” after the notice, meaning that claimants could freely terminate from one year to the next. For some entities, MGC also produced a “Letter of Extension” that extended a one-year Mandate Agreement indefinitely, subject to the same termination clause in the Representation Agreements. MGC also produced certain declarations or “Acknowledgements of Representation” that made various assertions regarding IPG’s or WSG’s engagement for specific royalty years.

Notably, not a single document specifically identified a year in which WSG was engaged after 2013. And with one exception (two 2016 documents from Eagle Mountain International Church), MGC did not produce documents or communications of any kind from its devotional claimants dated after the year 2014. And not a single document (including those from Eagle Mountain) applied to or even acknowledged royalty claims after the year 2013. Importantly, no documents produced indicated that authority was acquired or retained after claims were not filed in July 2015 for royalty year 2014, a lapse longer than the “semi-annual” period specified in the termination clause of each agreement produced. Ex. 18, Warley Decl. ¶ 16.

## **II. MGC MUST BE DENIED THE PRESUMPTION OF VALIDITY OF CLAIMS**

The Judges have developed a “presumption of validity” of filed claims, based on the certification required by regulation on each claim. When a claims challenge presents “any evidence calling into question the authority of [the agent] or the joint claimants that it

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<sup>4</sup> This summary is not a concession of the effect or validity of any of the documents discussed.



represents,” the presumption is burst. Distribution of 2000-03 Cable Royalty Funds, 78 F.R. 64984, 64988 (C.R.B. Oct. 30, 2013). “If the SDC produce sufficient evidence to rebut the presumption that a claim is valid, then IPG bears the burden of producing evidence to prove the validity of that claim by a preponderance of the evidence. IPG, as the participant seeking an order based on the validity of a questioned claim, retains the *burden of persuasion* throughout the proceeding regarding the validity of any questioned claim, notwithstanding the potential shifting of the *burden of production*.” 1999 Claims Ruling, at 9. MGC cannot retain a presumption of validity in the face of a multitude of countervailing facts regarding its conduct and claims in these and past proceedings, including past criminal and fraudulent behavior by its principals and agents, and evidence of false or wrongful filings and assertions in these and past proceedings.

**A. IPG and MGC Have Historically Been Denied the Presumption of Validity**

Since their ruling in the 1999 cable royalty proceedings, the Judges have denied the presumption of validity to WSG (and its related entities) in every subsequent case. In the 1999 Claims Ruling, the Judges denied IPG the presumption, citing Raul Galaz’s past criminal activity in copyright royalty proceedings and the new misconduct of filing a false claim in the proceedings at issue. 1999 Claims Ruling, at 3, 10-11 (“To maintain the viability of this claims distribution process, to preserve the reliability of the information presented to the Judges and to prevent the abuse of asymmetric information by participants, the elimination of the presumption of *prima facie* validity as to the claims IPG purports to represent constitutes a measured and proper response.”).

In their next claims ruling, the Judges concluded that continued misconduct justified the denial of the presumption, citing the fact that IPG had again filed false claims and Raul Galaz had presented false testimony regarding a discovery dispute. 2004-09 Claims Ruling, at 9-10

(“In short, the Judges cannot rationally consider any of IPG’s claims to be presumptively valid.”).

In their most recent claims ruling, the Judges denied the presumption to MGC, as the assignee of IPG’s claims. The Judges determined that the assignment was made, “at least in part, to evade the effect of the Judges’ prior rulings concerning the application of the presumption of validity to IPG’s claims.” 2010-13 Claims Ruling, at 7. The Judges found this attempted evasion constituted “fresh and sufficient evidence to cast doubt on [IPG/MGC’s] representation, underscoring the need to place the burden on [IPG/MGC] to substantiate its claims.” *Id.* Importantly, the Judges also concluded that whatever authority was transferred to MGC came “subject to any limitations imposed upon IPG by the Judges. Therefore, when IPG assigned its agency rights to MGC ... it could not assign an agency right that incorporated the presumption of validity.” *Id.* at 12-13. As an independent basis for stripping the presumption, the Judges concluded that IPG’s 2010-13 claims were tainted by its continued pattern of filing “unauthorized royalty claims” and claims made “without the authorization of the claimants.” 2010-13 Claims Ruling, at 10-11.

In these proceedings, MGC is the putative assignee of an entity that was repeatedly stripped of the presumption of validity. In addition, the long history of misconduct by the “identical personnel” who remain before the Judges today requires that MGC continue to be denied the presumption in these proceedings.

#### **B. Failure to File Claims for Royalty Year 2014**

Following the January 2015 transfer of authority from the original WSG/IPG company to the individual Alfred Galaz (using the assumed name MGC), no cable or satellite claims were filed in July 2015 by either WSG/IPG or Alfred Galaz for royalty year 2014. MGC has not produced any documents in discovery with respect to this failure, and this non-production is the

subject of the SDC's pending motion to compel. *See* Ex. 18, Warley Decl. ¶ 16. Accordingly, there is no evidence regarding either the reason for the failure or the response from claimants to losing the right to claim royalties for an entire year.

In light of MGC's failure to file claims in 2014, MGC must establish that its authority to represent its claimants was re-acquired or re-affirmed following the July 2015 filing deadline. If MGC's claimants did intend for it to represent them for 2015-17, that "intent must be expressed prior to the filing of the relevant claim." *Settling Devotional Claimants v. Copyright Royalty Board*, 797 F.3d 1106, 1115 (D.C. Cir. 2015). The Judges have explained that they "will not presume that circumstances have not changed in the interim because MGC is not entitled to that presumption." 2010-13 Claims Ruling, at 29. In this case, there were dramatic changes in the "interim" that materially harmed the claimants. Indeed, several WSG claimants moved on to authorize new agents. Jack Van Impe, one of MGC's purported claimants in the devotional category, filed claims for royalty year 2014 (and later) through a different agent: All Global Media, LLC ("AGM"). *See* Ex. 7, AGM Agreement (Mar. 30, 2006); Ex. 19, Lutzker Decl. Other former WSG claimants were also claimed by AGM in these proceedings. *See* Ex. 8, AGM Claims (2014-17). Even for claimants that didn't switch agents in 2014, the blanket sub-assignment of authority to Alfred Galaz (using the name MGC) and his immediate failure to file claims raises a serious question whether any claimants were actually comfortable continuing the arrangement following the loss of all 2014 royalties. MGC must prove its authority before it can proceed, "regardless of how the Judges may have ruled on IPG's representational authority at other points in time." 2010-13 Claims Ruling, at 29.

### **C. Claims Filed Without Authority by MGC in These 2014-17 Proceedings**

MGC has continued WSG's practice of filing claims without authorization in these proceedings. In addition to the three devotional claimants addressed specifically below, the

Judges have already addressed two instances in where MGC filed claims without authority on behalf of Phil Slater Associates (“Phil Slater”) and Jefferson Pilot Sports (aka Raycom Sports) (“Raycom”). These examples encapsulate the reason the Judges have denied the presumption of validity in the past, illustrating that WSG and MGC have failed to properly keep records of terminations and changes in their claimants, even when those claimants have quite emphatically or repeatedly expressed their intentions and even when evidence of such was raised and ruled on by the Judges in prior proceedings.

In the case of Phil Slater, it terminated its one-year Mandate Agreement with IPG back in 2003. Ex. 9, Phil Slater Termination Letter (April 11, 2003). In their last claims ruling, the Judges found IPG’s filing of claims for Phil Slater, with absolutely no basis to do so and “*many* years after the termination” to be an example that created a “level of uncertainty regarding the veracity of IPG’s royalty claims [that] cannot be understated.” 2010-13 Claims Ruling, at 10, 12. Nevertheless, MGC brazenly filed claims for Phil Slater again in these proceedings. This is nearly identical to the sequence of events with Tracee Productions, a false entity that Raul Galaz made up as part of his criminal fraud in copyright royalty proceedings. After the scheme was revealed, IPG shockingly filed claims for Tracee Productions in subsequent proceedings, an act the Judges described as an indication of “Mr. Galaz’s and IPG’s continuing disregard for the integrity of these royalty distribution proceedings.” 2004-09 Claims Ruling, at 10. The very act of filing a claim that was already established as false, regardless of whether fraud or carelessness was the reason, is grounds to deny the presumption of validity. *Id.* It does not matter that MGC has since withdrawn the claims; the fact that they were filed at all makes it impossible to trust the other MGC claims at face value. *Id.* at 9 (whether the wrongful claim was pursued fully “does

not excuse the original misconduct. Nor does it obviate the damage done to the integrity of the distribution process.”).

The Raycom claims are a fresh example of a filing made without any authority that demonstrates (at best) MGC’s and WSG’s failure to track and respect communications and terminations from claimants. The Judges have already dismissed MGC’s claims for Raycom, finding that that MGC “did not have the authority to file those claims.” Orders Granting MGC’s 2d Motions to Amend Petition to Participate, Dkts. 16-CRB-0009-CD (2014-17) & 16-CRB-0010-SD (2014-17), at 4 n.4 (Sept. 12, 2019). MGC argued that its filing was justified because it did not keep track of termination correspondence from Raycom, demonstrating that MGC’s failure to produce termination notices is not evidence that terminations did not take place. Orders Denying MGC’s Motion for Modification, Dkts. 16-CRB-0009-CD (2014-17) & 16-CRB-0010-SD (2014-17), at 2 (Oct. 22, 2019) (“Notably, MC’s counsel did not deny that he had ever received the March 2012 letter. Rather, he asserted that he had ‘completely forgotten about it.’”).

These examples of false claims filed in the present proceedings demonstrate MGC’s failure to ensure its filings were accurate and its certifications of authority truthful and well-supported. They independently justify stripping MGC of the presumption of validity in these proceedings. The Judges simply cannot rely on the certifications that accompanied MGC’s claims filings given the obvious – and longstanding – terminations that MGC conveniently overlooked prior to submitting those claims.

### **III. SPECIFIC CHALLENGES**

#### **A. MGC Has Not Established That Claimants Consented to the Transfer of Agency Powers from WSG to MGC**

California law requires that the delegation of agency powers must be “specially authorized by the principal.” Cal. Civ. Code § 2349(4).<sup>5</sup> When WSG purportedly transferred agency power to Alfred Galaz (as MGC) in early 2015, it did not seek the consent of any of the claimants. Based on MGC’s non-objection and non-production in response to document requests that sought such documents,<sup>6</sup> it is established that MGC did not have any communications with claimants regarding these transfers, and therefore did not obtain their consent. *See* 2010-13 Claims Ruling, at 15 (“MGC should have produced it. Having failed to do so, MGC may not now rely on that letter to support its claim.”); *id.* at 27-34 (dismissing MGC claimants because documentation was not produced in discovery prior to briefing on claims challenges).

California law protects a principal’s right to be informed of material events relating to the subject of their agency agreements. “As a general rule, an agent has a duty to disclose material matters to his or her principal.” *O’Riordan v. Fed. Kemper Life Assurance Co.*, 36 Cal.4th 281, 288 (2005); Cal Civ. Code § 2332 (requiring communication between agent and principal as a matter of “good faith and the exercise of ordinary care and diligence”). The transfer of agency powers to Alfred Galaz (using the name MGC) and the failure to file 2014 royalty claims were both material events occurring in a six-month period in 2015. Yet MGC produced no communications between it (or its predecessors) and devotional claimants after 2014. And despite producing documents relating to the transfers of authority themselves, MGC did not

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<sup>5</sup> By their terms, WSG’s agreements are governed by California law.

<sup>6</sup> MGC did not object or state it was withholding documents in response to requests relating to its claims of continuing representational authority or for documents that would tend to undermine such authority. Ex. 10, MGC Response to SDC Discovery Requests (Feb. 18, 2022), at Nos. 21, 19, 18.

produce a single document or communication evidencing consent to such transfers by any claimants. Ex. 18, Warley Decl. ¶ 17. These conspicuous absences in the production establish that WSG did not correspond with its claimants regarding the transfer, and therefore failed to properly complete the transfer under California law.

While the Judges previously rejected an argument that consent was required for the WSG-MGC transfer, that ruling was distinct from the issue presented here. First, it was not based on California law, but on an interpretation of the regulations governing agents in copyright royalty proceedings and prior claims rulings. The Judges specifically noted that the parties challenging the transfer in the 2010-13 proceedings “failed to point to any legal rule that would impose that obligation [to obtain consent from claimants that had entered into representation agreements with IPG for MGC to act as their representative in these proceedings] by operation of law.” 2010-13 Claims Ruling, at 14. Such a rule under California law is now before the Judges.<sup>7</sup>

Second, in the 2010-13 proceedings it was WSG, not MGC, that filed claims. In this case, the question is not whether MGC can continue the representation of claims the Judges determined were validly filed in 2010-13, but whether new claims filed after the supposed assignment were made with authority in the first place. Thus, this is the first opportunity the Judges have had to consider the California Civil Code’s specific requirement for consent to transfer agency powers to another agent, which imposes exactly the “obligation by operation of law,” that was not presented to the Judges in their prior ruling.

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<sup>7</sup> The Judges declined to consider California law at the very end of the 2010-13 proceedings because the argument was raised in opposition to WSG’s motion to substitute parties right before final distribution, instead of at the claims challenge stage. Order Granting Motion of WSG for Substitution of Parties, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13), at 3-4 (Dec. 8, 2020) (refusing to consider California Civil Code argument on “law of the case” grounds).

The California Supreme Court has denied an agent's ability to assign the right to collect a claim in the absence of authorization from the principal. *Dingley v. McDonald*, 124 Cal. 682 (1899). The case involved an agent authorized to collect on a claim, much like the agency authority at issue in these proceedings, and the court held:

The general power given [to the authorized agent] was based upon the special trust and confidence reposed in his personal ability and integrity, and the rule is that such power, in the absence of authority, express or implied, cannot be redelegated by the agent so as to bind the principal.

*Id.* at 687. By law, WSG could not delegate or assign its agency powers to another agent like Alfred Galaz (using the name MGC at the time) without the special consent of the claimants, which is absent. *See also Navigators Specialty Ins. Co. v. St. Paul Surplus Lines Ins. Co.*, No. 13-cv-03499-SC, 2015 WL 4148319, at \*2-3 (N.D. Cal. July 9, 2015) (insurance company's agent was not authorized under Cal. Civ. Code § 2349 to delegate powers to subagent); *Wood River Capital Resources, LLC v. Stewart Title Guaranty Company*, No. A131736, 2013 WL 637903, at \*6 (Cal. App. Feb. 21, 2013) ("An agent cannot lawfully delegate its powers to a subagent unless one or more of the conditions in Civil Code section 2349 is satisfied.").

The import of this requirement is rooted not only in California law, but also in the integrity of the claims process. If the Judges invalidate claims that MGC improperly asserted, those claimants will have redress under California law for the harm WSG and MGC caused them. However, the damage done to the claims process will be lasting if the Judges permit WSG and MGC to escape any consequences for breaching or ignoring the legal rules and procedural safeguards in place to ensure agency authority is properly established at the outset of the claims process, and that the claimant-principal's intent is honored.



**B. Salem Baptist Church of Chicago, Inc.**

MGC has not produced evidence that it had authority to represent Salem Baptist in 2015-17. The only agreement produced [REDACTED]. Ex. 11, Salem Baptist Agreement (July 31, 2002). A declaration from a Salem Baptist representative states that [REDACTED]. Ex. 12, Abney Decl. ¶¶ 3, 6 (Nov. 22, 2014). No new or replacement contract was produced. Ex. 18, Warley Decl. ¶ 12. Even a fully-signed extension (not just a reference in a declaration), “alone, without the underlying agreement, cannot establish the validity of the original representation or provide a basis to ascertain all of the essential terms of the alleged original agreement, such as temporal or geographical limitations, affiliated claimants, the authority of the signer, etc.” 2000-03 Claims Ruling, at 5.

Instead, attached to the declaration is an Acknowledgement of Representation that, by its terms, only covers royalty years [REDACTED]. Ex. 12, Abney Decl. at p. 4. An Acknowledgement of Representation will only go as far as “the term specified in the ‘Acknowledgement.’” 2004-09 Claims Ruling, at 32. Thus, there is no evidence that authority existed in the 2015-17 years for which MGC now asserts claims for Salem Baptist. 2000-03 Claims Ruling at 5 n.10 (“Ambiguous indicia of retroactive ratification of asserted authority are insufficient to establish that authority was in place when a claim was filed.”).

**C. IWV Media Group, Inc.**

IWV is not a legitimate claimant because it is no longer an operating entity in good standing. In 2009, the Texas Secretary of State permanently forfeit IWV’s corporate charter under the Texas Tax Code. Ex. 14, IWV Forfeiture (July 24, 2009). The charter was not reinstated before claims in these proceedings were filed, and it remains forfeit. Ex. 13, Nye Decl. ¶¶ 2-4; Ex. 15, IWV Filing History. “Forfeiture of a corporate charter for non-payment of

taxes acts as a dissolution of the corporation.” *In re ABZ Ins. Servs., Inc.*, 245 B.R. 255, 257 (Bankr. N.D. Tex. 2000). This dissolution revoked IWV’s right to transact business. Tex. Bus. Orgs. Code § 11.356(b) (prohibiting terminated corporation from “continuing the business or affairs for which the terminated filing entity was formed”); *see also In re Am. Heartland Sagebrush Sec. Invs., Inc.*, 334 B.R. 848, 853 (Bankr. N.D. Tex. 2005). Thus, IWV is not an existing business entitled to pursue claims, nor was it at the time MGC filed claims. Whether through inattentiveness or intent, MGC has filed claims for an entity that ceased to exist six years before the first claim was filed.

#### **D. Jack Van Impe Ministries International**

MGC’s claims on behalf of Jack Van Impe must be dismissed because valid claims have been filed by AGM on behalf of the same claimant, and AGM’s exclusive authority to collect copyright royalties was acquired after the date on the agreement IPG produced with Jack Van Impe. The agreement presented by MGC was [REDACTED] with a date of July 25, 2002. Ex. 16, Jack Van Impe Agreement (July 25, 2002). MGC also produced a Letter of Extension with the same date. Ex. 17, Jack Van Impe Extension, ¶ 1 (July 25, 2002).

Years later, in 2006, Jack Van Impe signed an agreement with AGM, granting AGM the “exclusive assignment of certain rights ... to administer, which includes the application and collection, of ... cable and satellite retransmission royalties.” Ex. 7, AGM Agreement, §1(a) (Mar. 30, 2006). Jack Van Impe “warrant[ed] that it has the exclusive right to the Programs to enter into this Agreement and to grant and assign the right to administer herein to AGM.” *Id.* § 3(a). [REDACTED] Jack Van Impe’s representation that four years later it was now in exclusive control of the rights to collect its copyright royalties indicates that the rights granted to IPG were terminated in the interim. Indeed, AGM’s agreement affirmatively expressed Jack Van Impe’s intention that AGM’s authority would

supersede that associated with any other claims (including those previously filed by IPG):

“Company has prior filings including but not limited with the U.S. Copyright Office, which were filed as part of a Joint filing. Company hereby appoints AGM as its new agent effective immediately to administer those prior and any other filings with regard to the Company.” *Id.* § 1(c).

“[T]he Judges will take the later-in-time agreement between a claimant (or its representative) and a party as the most persuasive evidence concerning representation.” 2010-13 Claims Ruling, at 19-20. Jack Van Impe very well may have sent a termination notice that MGC misplaced or forgot about, but “the absence of a termination notice, however, is evidence neither of a claimant’s intent to terminate representation nor its intent to continue that representation. The Judges look to other evidence, such as a new agreement with a new representative, to infer whether or not the claimant intended to continue its arrangement with IPG.” 2010-13 Claims Ruling, at 20. Not only has AGM executed a superseding representation agreement and filed claims, it has also joined a petition to participate filed by PBS. *See* Joint Petition to Participate of PBS, Dkt. 16-CRB-0009-CD (2014-17), at A-7, B-8, C-2, D-7 (Mar. 11, 2019). No evidence exists to question the validity of the claims filed by AGM or the petition to participate filed by PBS – those entities retain the presumption of validity. The “proffer of conflicting agreements, combined with the presumption of validity ... is sufficient to cast doubt on MGC’s representation of the claimants affected by those agreements.” 2010-13 Claims Ruling, at 20 n.42. However, the presumption of validity is not necessary to resolve the conflict. The evidence expressly indicates that Jack Van Impe chose AGM as its agent over its prior representative. The Judges must honor the claimant’s choice of agent, and that agent’s strategy for participation. MGC’s claims for Jack Van Impe must be dismissed.

#### IV. CONCLUSION

For the foregoing reasons, MGC's claims in the devotional category should be dismissed.

Date: May 4, 2022

Respectfully submitted,

/s/ Michael Warley

Matthew J. MacLean (DC Bar No. 479257)

[Matthew.MacLean@pillsburylaw.com](mailto:Matthew.MacLean@pillsburylaw.com)

Michael A. Warley (DC Bar No. 1028686)

[Michael.Warley@pillsburylaw.com](mailto:Michael.Warley@pillsburylaw.com)

Jessica T. Nyman (D.C. Bar No. 1030613)

[Jessica.Nyman@pillsburylaw.com](mailto:Jessica.Nyman@pillsburylaw.com)

PILLSBURY WINTHROP SHAW PITTMAN LLP

1200 Seventeenth Street, NW

Washington DC 20036

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Benjamin Sternberg (DC Bar No. 1016576)

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LUTZKER & LUTZKER LLP

1233 20th Street, NW, Suite 703

Washington DC 20036

Tel: (202) 408-7600

Fax: (202) 408-7677

*Counsel for Settling Devotional Claimants*

#### Certificate of Service

I certify that on May 4, 2022, I caused the foregoing to be served on all parties by filing through the eCRB system.

/s/ Michael Warley

Michael Warley

**COPYRIGHT ROYALTY JUDGES**  
**The Library of Congress**

<i>In re</i>	
<b>DISTRIBUTION OF CABLE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0009-CD (2014-2017)</b>
<b>DISTRIBUTION OF SATELLITE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0010-SD (2014-2017)</b>

**[PROPOSED]**  
**ORDER DISMISSING MULTIGROUP CLAIMANTS' DEVOTIONAL CLAIMS**

The Settling Devotional Claimants ("SDC") move to disallow claims asserted by Multigroup Claimants ("MGC") in the devotional category for the following claimants:

- Benny Hinn Ministries
- World Changers Church International, Inc. dba Creflo A. Dollar Ministries
- Eagle Mountain Int'l Church (Kenneth Copeland Ministries)
- IWV Media Group, Inc.
- Life Outreach International
- Jack Van Impe Ministries International
- Salem Baptist Church of Chicago, Inc.

Upon consideration of the SDC's motion, MGC's response, the SDC's reply, and the record before the Judges, the motion is hereby **GRANTED**. MGC's claims for these seven claimants are hereby **DISMISSED**.

**SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
Copyright Royalty Judge

## **INDEX OF SDC CLAIMS CHALLENGE EXHIBITS**

Docket Nos. 16-CRB-0009-CD (2014-17) & 16-CRB-0010-SD (2014-17)

May 4, 2022

<b><u>Exhibit #</u></b>	<b><u>Document</u></b>
Ex. 1 .....	WSG-MGC Transfer (Jan. 20, 2015)
Ex. 2 .....	MGC Assumed Name Record (Jan. 20, 2015)
Ex. 3 .....	WSG Transfer (Dec. 31, 2017)
Ex. 4 .....	MGC Transfer (Jan. 1, 2018)
Ex. 5 .....	Ryan Galaz Transfer (Oct. 14, 2020)
Ex. 6 .....	MGC Assumed Name Certificate (Jan. 6, 2020)
Ex. 7 .....	AGM Agreement (Mar. 30, 2006)
Ex. 8 .....	AGM Claims (2014-17)
Ex. 9 .....	Phil Slater Termination Letter (April 11, 2003)
Ex. 10 .....	MGC Response to SDC Discovery Requests (Feb. 18, 2022)
Ex. 11 .....	Salem Baptist Agreement (July 31, 2002) [Restricted]
Ex. 12 .....	Abney Decl. (Nov. 22, 2014) [Restricted]
Ex. 13 .....	Nye Declaration (May 4, 2022)
Ex. 14 .....	IWV Forfeiture (July 24, 2009)
Ex. 15 .....	IWV Filing History with Texas Secretary of State
Ex. 16 .....	Jack Van Impe Agreement (July 25, 2002) [Restricted]
Ex. 17 .....	Jack Van Impe Extension (July 25, 2002) [Restricted]
Ex. 18 .....	Warley Declaration (May 4, 2022)
Ex. 19 .....	Lutzker Declaration (May 4, 2022)

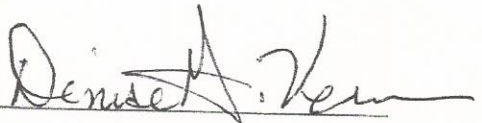
# **Exhibit 1**

**AUTHORIZATION and TRANSFER**

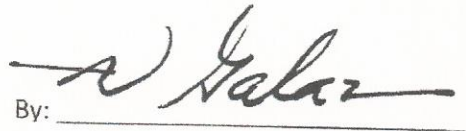
For good and valuable consideration, hereby acknowledged as received, Worldwide Subsidy Group LLC dba Independent Producers Group hereby engages and authorizes Multigroup Claimants to act as its representative in connection with all proceedings relating to U.S. cable and satellite retransmission royalties, to the extent that such proceedings relate to 2010 broadcasts and thereafter, until such parties agree otherwise. Such authorization and transfer shall apply to all categories of programming, subject to the caveat that it shall include Spanish language programming only in the event that such programming is not defined as a separate "Phase I" category, whether by order or stipulation of participants in such proceedings.

Effective Date: January 20, 2015

**WORLDWIDE SUBSIDY GROUP LLC  
dba INDEPENDENT PRODUCERS  
GROUP**

By: 

**MULTIGROUP CLAIMANTS**

By: 



# **Exhibit 2**



Shelley Coston

County Clerk, Bell County

P.O. Box 480

Belton, Texas 76513

Record #

**ASSUMED NAME (DBA) CERTIFICATE OF OWNERSHIP  
FOR A BUSINESS OR PROFESSION**

NOTICE: "Assumed Names/DBA" are valid only for a period not to exceed 10 years from the date filed in the County Clerk's Office. THE COUNTY CLERK IS NOT RESPONSIBLE FOR VERIFYING THE ACCURACY OF THE INFORMATION CONTAINED IN AN "ASSUMED NAME/DBA" CERTIFICATE. THIS CERTIFICATE PROPERLY EXECUTED IS TO BE FILED IMMEDIATELY WITH THE COUNTY CLERK.

BUSINESS NAME: Multigroup Claimants  
PHYSICAL BUSINESS ADDRESS: 508 Red Cloud Dr  
CITY: Harker Heights STATE: TX ZIP CODE: 76548  
BUSINESS/OWNER'S PHONE NUMBER: (254) 699-5800

BUSINESS IS TO BE CONDUCTED AS (CHECK ONLY ONE):

☐ GENERAL PARTNERSHIP

☒ SOLE PROPRIETORSHIP

☐ LIMITED PARTNERSHIP

☐ OTHER \_\_\_\_\_

**CERTIFICATE OF OWNERSHIP**

I/We, the undersigned, are the owner(s) of the above business and my/our name(s) and physical address(es) given is/are true and correct, and there is/are no ownership(s) in said business other than those listed herein below.

**NAMES OF OWNERS**

Name: Alfred Galaz Signature: A Galaz

Residence Address: 508 Red Cloud Dr Zip: 76548 DOB: 2/06/1935

Name: Harker Heights, TX Signature: \_\_\_\_\_

Residence Address: \_\_\_\_\_ Zip: \_\_\_\_\_ DOB: \_\_\_\_\_

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Residence Address: \_\_\_\_\_ Zip: \_\_\_\_\_ DOB: \_\_\_\_\_

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Residence Address: \_\_\_\_\_ Zip: \_\_\_\_\_ DOB: \_\_\_\_\_

**THE STATE OF TEXAS AND COUNTY OF BELL**

This instrument was acknowledged before me on \_\_\_\_\_,

by Alfred Galaz

(BUSINESS OWNER/OWNERS' NAME(S) MUST APPEAR HERE)

GIVEN UNDER MY HAND AND SEAL OF OFFICE, on \_\_\_\_\_,

**SHELLEY COSTON, BELL COUNTY CLERK**

BY: DEPUTY COUNTY CLERK

"OR"

NOTARY PUBLIC

(SEAL)

FOR RECORDING PURPOSES ONLY

# BELL COUNTY TREASURER OFFICIAL RECEIPT

County Clerk  
Miscellaneous Payment

STATE OF TEXAS  
COUNTY OF BELL  
Belton

RECEIPT NUMBER

736894



Method of Payment Cash

Comment DBA COPY

Date January 20, 2015

Received of: GALAZ

Amount \$12.00

Clerk M. Yoder

Customer Copy

CERTIFIED COPY  
DOCUMENT ATTACHED IS A  
TRUE AND CORRECT COPY  
OF THE ORIGINAL ON FILE

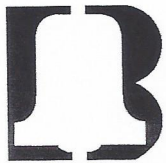
JAN 20 2015



CO. CLERK, BELL CO., TX

*Shelley Coston*  
*By M Yoder*  
*Deputy*





# Assumed Name Records

2015000148

## Certificate of Ownership for a Business or Profession

Name in which business will be conducted: MULTIGROUP CLAIMANTS  
Business address: 508 RED CLOUD DR  
HARKER HEIGHTS, TX 76548

This business will be conducted as: Sole Proprietor  
Period during which assumed name will be used: 10 YEARS

I/WE, the undersigned am/are the owner(s) of the above business and my/our name and address given is/are true and correct, and there is/are no other ownership(s) in said business other than those listed below.

Alfred Galaz

ALFRED GALAZ  
508 RED CLOUD DR, HARKER HEIGHTS, TX 76548

Number of owners included 1  
No others follow.

FILED FOR RECORD  
JAN 20 2015  
SHELLEY COSTON  
COUNTY CLK BELL CO. TEXAS

## BELL COUNTY TREASURER OFFICIAL RECEIPT

County Clerk  
General Payment

STATE OF TEXAS  
COUNTY OF BELL  
Belton

RECEIPT NUMBER

736892



Cause Number County Clerk Index

Method of Payment Cash

Comment Record Assumed Bus Name

Date January 20, 2015

Received of: **MULTIGROUP CLAIMANTS**

Amount \$5.00

Clerk M. Yoder

Customer Copy

State of Texas  
County of Bell

**BEFORE ME**, the Undersigned Authority, on this day personally appeared the above named individual(s) known to me to be the person(s) whose name(s) is/are subscribed to the forgoing instrument and acknowledged to me that he/she/they are the owner(s) of the above named business and that he/she/they signed the same for the purpose and consideration therein expressed.

Given under my hand and seal of office on January 20th, 2015

Shelley Coston  
Bell County Clerk, Bell County, Texas

Deputy:

M. Yoder  
Melissa L Yoder

# **Exhibit 3**

**TRANSFER OF OWNERSHIP INTERESTS IN  
WORLDWIDE SUBSIDY GROUP, LLC  
dba INDEPENDENT PRODUCERS GROUP**

Effective December 31, 2017, for and in consideration of the sum of one dollar and good and valuable consideration, we hereby agree that AL GALAZ and RUTH GALAZ, members and economic interest holders in Worldwide Subsidy Group, LLC (WSG), a Texas limited liability company, sometimes doing business as Independent Producers Group, hereby transfer and assign to RYAN GALAZ all of their right, title and interest in WSG, including but not limited to any interest as member or economic interest holders in WSG.

AL GALAZ and RUTH GALAZ, their agents, employees, officers, consultants, directors, successors and assigns, shall indemnify and hold harmless RYAN GALAZ from and against any and all damages, liabilities, losses, expenses, taxes, costs or claims (including attorneys' fees). The term "claims" means any claim or right or demand to assert or recover money for a debt or for actual or exemplary damages or for any restitution, statutory or regulatory penalty, or any other remedy providing for recovery of money. Such right remains exclusive to RYAN GALAZ, and any attempt to transfer such right to a third party shall be deemed null and void *ab initio*.

This agreement and transfer is approved by all members of WSG in accordance with the articles of organization and the regulations of the company.

Al Galaz *Al Galaz* 12/31/17

Ruth Galaz *Ruth Galaz* 12/31/17

Ryan Galaz *Ryan Galaz* 12/31/17

# **Exhibit 4**

**TRANSFER OF OWNERSHIP INTERESTS  
IN MULTIGROUP CLAIMANTS AND  
SPANISH LANGUAGE PRODUCERS**

Effective January 1, 2018, for and in consideration of the sum of one dollar and such other good and valuable consideration, we hereby agree that AL GALAZ, owner of all interests in MULTIGROUP CLAIMANTS and SPANISH LANGUAGE PRODUCERS, sole proprietorships, hereby transfers and assigns to RYAN GALAZ all of his right, title and interest thereto, including but not limited to any interest as a legal or economic interest holder, and any interest in executory contracts to which such entities are a party or beneficiary.

AL GALAZ hereby represents that MULTIGROUP CLAIMANTS and SPANISH LANGUAGE PRODUCERS have no current financial obligations, and no current value. In the event such representation is subsequently established to be inaccurate, AL GALAZ, his agents employees, officers, consultants, directors, successors and assigns, shall indemnify and hold harmless RYAN GALAZ from and against any and all damages, liabilities, losses, expenses, taxes, costs or claims (including attorneys' fees) as a result thereof. The term "claims" means any claim or right or demand to assert or recover money for a debt or for actual or exemplary damages or for any restitution, statutory or regulatory penalty, or any other remedy providing for recovery of money. Such right remains exclusive to RYAN GALAZ, and any attempt to transfer such right to a third party shall be deemed null and void *ab initio*.

This agreement and transfer is approved by all owners or interest holders in MULTIGROUP CLAIMANTS and SPANISH LANGUAGE PRODUCERS.

Al Galaz *Al Galaz* 1/01/2018

Ryan Galaz *Ryan Galaz* 1/1/2018



# **Exhibit 5**

**TRANSFER OF INTERESTS  
TO WORLDWIDE SUBSIDY GROUP LLC**

Effective January 1, 2018, for and in consideration of the sum of one dollar and other good and valuable consideration, Ryan Galaz hereby transfers to Worldwide Subsidy Group LLC, any and all right, title, and interests previously held by Multigroup Claimants and Spanish Language Producers, sole proprietorships of Alfred Galaz, including but not limited to any interest as an owner or economic interest holder in such interests. Ryan Galaz acknowledges that the interests previously held by Multigroup Claimants and Spanish Language Producers were transferred to him effective January 1, 2018, and it is his intention, belief and representation that such interests did immediately vest with Worldwide Subsidy Group LLC, an entity solely owned by Ryan Galaz, in accordance with this post-facto memorialization.

Worldwide Subsidy Group LLC, its agents, employees, officers, consultants, directors, successors and assigns, shall assume all obligations to which the Multigroup Claimants interests and Spanish Language Producers interests were subject, and shall indemnify and hold harmless Ryan Galaz from and against any and all damages, liabilities, losses, expenses, taxes, costs or claims (including attorneys' fees). The term "claims" means any claim or right or demand to assert or recover money for a debt or for actual or exemplary damages or for any restitution, statutory or regulatory penalty, or any other remedy providing for recovery of money. Such right remains exclusive to Ryan Galaz, and any attempt to transfer such right to a third party shall be deemed null and void *ab initio*.

This agreement and transfer is approved by Ryan Galaz and all owners of Worldwide Subsidy Group LLC in accordance with the articles of organization and the regulations of the company.

*Ryan Galaz*

\_\_\_\_\_  
RYAN GALAZ,

in his personal capacity

DATED: 10/14/2020

*Ryan Galaz*

\_\_\_\_\_  
RYAN GALAZ,

as the authorized representative of  
Worldwide Subsidy Group LLC

DATED: 10/14/2020

# **Exhibit 6**

**Form 503**  
**(Revised 08/19)**

Return in duplicate to:  
Secretary of State  
P.O. Box 13697  
Austin, TX 78711-3697  
512 463-5555  
FAX: 512 463-5709  
**Filing Fee: \$25**



This space reserved for office use.

**Assumed Name Certificate**

**Assumed Name**

1. The assumed name under which the business or professional service is, or is to be, conducted or rendered is: Multigroup Claimants

**Entity Information**

2. The legal name of the entity filing the assumed name is:

Worldwide Subsidy Group, LLC

*State the name of the entity as currently shown in the records of the secretary of state or on its organizational documents, if not filed with the secretary of state.*

3. The entity filing the assumed name is a: (Select the appropriate entity type below.)

- |   |   |
|---|---|
| <input type="checkbox"/> For-profit Corporation   | <input checked="" type="checkbox"/> Limited Liability Company |
| <input type="checkbox"/> Nonprofit Corporation    | <input type="checkbox"/> Limited Partnership                  |
| <input type="checkbox"/> Professional Corporation | <input type="checkbox"/> Limited Liability Partnership        |
| <input type="checkbox"/> Professional Association | <input type="checkbox"/> Cooperative Association              |
| <input type="checkbox"/> Other _____              |   |

*Specify type of entity. For example, foreign real estate investment trust, state bank, insurance company, etc.*

4. The file number, if any, issued to the entity by the secretary of state is: 704877122

5. The state, country, or other jurisdiction of formation of the entity is: Bexar

6. The entity's principal office address is:

132 Perry Ct.

*Street or Mailing Address*

San Antonio

TX

USA

33140

*City*

*State*

*Country*

*Postal or Zip Code*

**Period of Duration**

☒ 7a. The period during which the assumed name will be used is 10 years from the date of filing with the secretary of state.

OR

☐ 7b. The period during which the assumed name will be used is \_\_\_\_\_ years from the date of filing with the secretary of state (not to exceed 10 years).

OR

☐ 7c. The assumed name will be used until \_\_\_\_\_ (not to exceed 10 years).  
*mm/dd/yyyy*

### County or Counties in which Assumed Name Used

8. The county or counties where business or professional services are being or are to be conducted or rendered under the assumed name are:

☒ All counties


☐ All counties with the exception of the following counties: \_\_\_\_\_

☐ Only the following counties: \_\_\_\_\_

### Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and also certifies that the person is authorized to sign on behalf of the identified entity. If the undersigned is acting in the capacity of an attorney in fact for the entity, the undersigned certifies that the entity has duly authorized the undersigned in writing to execute this document.

Date: January 6, 2020

  
Ruth Galaz

Signature of a person authorized by law to sign on behalf of the identified entity (see instructions)



## Office of the Secretary of State

### CERTIFICATE OF FILING OF

WORLDWIDE SUBSIDY GROUP LLC

File Number: 704877122

Assumed Name:

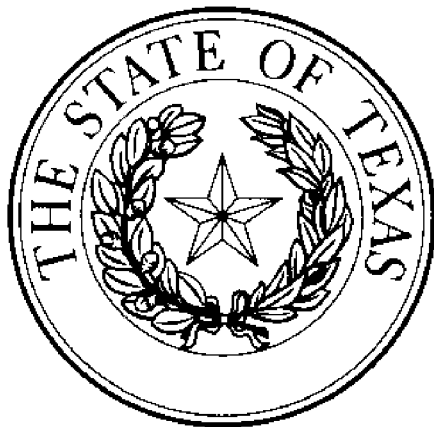
Multigroup Claimants

The undersigned, as Secretary of State of Texas, hereby certifies that the assumed name certificate for the above named entity has been received in this office and filed as provided by law on the date shown below.

ACCORDINGLY the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law hereby issues this Certificate of Filing.

Dated: 01/06/2020

Effective: 01/06/2020



A handwritten signature in black ink, appearing to read "Ruth R. Hughs".

Ruth R. Hughs  
Secretary of State

# **Exhibit 7**

## **SECONDARY RIGHTS AGREEMENT**

**THIS AGREEMENT is made the 30 day of March, 2006 BETWEEN:**

**ALL GLOBAL MEDIA, 1158 26<sup>th</sup> Street, #870, Santa Monica, CA 90403, ("AGM") and  
JACK VAN IMPE MINISTRIES INTERNATIONAL,  
("Company")**

**This agreement will confirm the basic terms of agreement between AGM and Company regarding the exclusive assignment of certain rights in the Programs (as hereinafter defined).**

**NOW IS AGREED as follows:**

### **1. ASSIGNMENT**

**(a) The Company hereby grants and assigns to AGM the right to administer, which includes the application and collection, of royalties distributed by collection societies throughout the world for all program works owned or distributed by the Company, including but not limited to the attached list of Programs (Schedule 'A'). The royalties specified include but are not limited to, rental rights; educational levies; private copyright levies; and cable and satellite retransmission royalties (in the United States pursuant to 17 U.S.C. Sections 111 and 119).**

**(c) Company has prior filings including but not limited with the U.S. Copyright Office, which were filed as part of a Joint filing. Company hereby appoints AGM as its new agent effective immediately to administer those prior and any other filings with regard to the Company.**

### **2. FINANCIAL TERMS**



### **3. REPRESENTATION AND WARRANTIES**

- (a) Company warrants that it has the exclusive right to the Programs to enter into this Agreement and to grant and assign the right to administer herein to AGM.
- (b) AGM represents and warrants to Company that it has the full power and ability to enter into and duly perform this Agreement and that it will not exercise any of the copyrights or other rights in the works other than has been authorized under this Agreement. AGM makes no representation as to the existence or amount of royalties to be received for Company.
- (c) Company indemnifies AGM and holds AGM, its officers, agents and/or affiliates fully harmless from any claim by any third parties with respect to the right to administer royalties herein.
- (d) The warranties and indemnities of each party shall survive the termination of this Agreement.

### **4. MISCELLANEOUS**

- (a) Any dispute arising out of this Agreement shall be governed by and subject to the laws of California.
- (b) Company and AGM agree that the parties shall not reveal the terms of this Agreement to any third party unless required to do by the authority of a court of competent jurisdiction. Additionally, AGM agrees to keep all program information provided by Company confidential from any third party not engaged by AGM.
- (c) Notices shall be in writing to the addresses indicated above.

Please confirm your acceptance and agreement to the foregoing by signing where indicated below.

SIGNED BY  
for and on behalf of  
JACK VAN IMPE MINISTRIES INTERNATIONAL  
("Company")

SIGNED BY  
for and on behalf of  
ALL GLOBAL MEDIA  
("AGM")

# **Exhibit 8**

365

**Keys, LaKeshia**

---

**From:** kormond@allglobalmedia.biz  
**Sent:** Sunday, July 26, 2015 10:17 PM  
**To:** CableClaims  
**Subject:** Cable Joint Claim from ALL GLOBAL MEDIA, LLC  
**Attachments:** AGM\_List\_of\_Claimants\_July\_2014\_filing.pdf

**Joint Claim for Cable Retransmission Royalty Fees**

In accordance with section 111 of the Copyright Act, 17 U.S.C., and Subpart A of Part 360 of the Copyright Royalty Board regulations, 37 CFR 360.1 through 360.5, the copyright owner claimants named herein file with the Copyright Royalty Board of the Library of Congress a claim to royalty payments collected from cable television systems retransmitting copyrighted programming contained on over-the-air television and radio broadcast signals. This joint claim to royalties is for fees collected from cable television systems during calendar year 2014.

Filer's full name:

ALL GLOBAL MEDIA, LLC

Filer's full address:

1158 26TH STREET #670  
SANTA MONICA, CA 90403  
USA

Telephone number of person or entity filing the claim:

310-828-8245

Fax number, if any, of person or entity filing the claim:

781-823-7977

Email:

[kormond@allglobalmedia.biz](mailto:kormond@allglobalmedia.biz)

Contact Person:

K. Ormond

Phone:

310-828-8245

Fax:

781-823-7977

Email:

[kormond@allglobalmedia.biz](mailto:kormond@allglobalmedia.biz)

Full legal names and addresses of the copyright owners. The copyright owners listed below have duly authorized the person or entity named herein to file this claim on their behalf.:

AGM List of Claimants July 2014 filing.pdf

A general statement of the nature of the copyright owners' works (e.g., motion pictures, syndicated television series, sports broadcasts, music, news, and other station-produced programming.):

TV PROGRAMS (e.g. on public TV)

Example(s): Below, provide at least one example of a secondary retransmission of either a non-music (Example A) or music (Example B) work by filling in the blanks.

Example A (Non-Music): The copyrighted broadcast program TAVIS SMILEY REPORTS: EDUCATION UNDE ARREST, which is owned by ALL GLOBA MEDIA LLC was the subject of a primary transmission made by broadcast station KTWU-DT, which is licensed to the city of TOPEKA, located in the state of KS, on 06/17, 2014 and was retransmitted by cable system CABLE ONE INC, which serves the community of (city) CHANUTE, (state) KS.

Claim submitted at 22:16 on 7/26/15. There is 1 attached file.

365

**ALL GLOBAL MEDIA  
List of Claimants**

ACME Communications, Inc.  
10829 Olive Blvd., Suite 202  
St. Louis, MO 63141

Bobby Goldstein Productions  
4516 Lovers Lane  
Dallas, TX 75225

C/F International, Inc.  
2112 Eastman Ave., #115  
Ventura, CA 93003

Chesler/Perlmutter Productions Inc.  
129 Yorkville Ave., Ste. 200  
Toronto Ontario M5R 1C4

Cinemaginaire Inc.  
5144, boulevard Saint-Laurent  
Montreal, Quebec H2T 1R8

Collin Siedor (and Subsidiaries)  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

CWK Network, Inc.  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

Debmar/Mercury LLC  
225 Santa Monica Blvd.  
8<sup>th</sup> Floor  
Santa Monica, CA 90401

Eagle Media  
22 Armoury Way  
London SW18 1EZ UK

Epiphany Pictures, Inc.  
10625 Esther Ave  
Los Angeles, CA 90064

FamilyNet, Inc. (aka Media  
Technologies Group and Broadcast  
Communications Group of the North  
American Mission Board)  
6350 West Freeway  
Forth Worth, TX 76116

Fishing University LLC  
365 Bluff Drive  
Winchester, TN 37398  
Florentine Films/Hott Productions  
20 Kingsley Ave., P.O. Box 476  
Haydenville, MA 01039

Global Response LLC  
5720 Smetana Drive, Ste. 350  
Minnetonka, MN 55343

Good Time Golf Media Group LLC  
P.O. Box 11037  
Boulder, CO 80301

Great Chefs Television GCI Inc.  
P.O. Box 56757  
New Orleans, LA 70156-6756

Green Power Media  
4320 Via Marina, #A  
Marina del Rey, CA 90292

Hollywood Close Ups, Inc.  
4120 St. Clair Avenue  
Studio City, CA 91604

Independent Communications  
Associates, Inc.  
38 Miller Avenue  
Mill Valley, CA 94941

Jack Van Impe Ministries  
1718 Northfield Drive  
Rochester Hills, MI 48309

JMJ Films Inc.  
11 West 84<sup>th</sup> Street, #4  
New York, NY 10024-4761

Mainframe Entertainment  
2025 West Broadway, Suite 200  
Vancouver, BC  
Canada, V6J 1Z6

Mansfield Television Distribution Co.  
13924 Panay Way, P-604  
Marina del Rey, CA 90292

Mabinogion Films  
POB 92  
Spencertown, NY 12165

Mark Anthony Productions  
1375 Broadway, 21st Floor  
New York, NY 10018

365

ALL GLOBAL MEDIA  
List of Claimants

365

M. Entertainment  
10662 Chanel Lane  
Stockton, CA 95212

Money.net.TV Inc.  
251 Jeanell Drive, #3  
Carson City, NV 89703

Nelson Davis Television Productions  
2809 2nd Street, Suite 2  
Santa Monica, CA 90405

New Dimension Media  
680 N. Lake Shore Drive, Suite 900  
Chicago, Illinois 60611

Nightengale Associates, Inc.  
407 Philadelphia Pike  
Wilmington, DE 19809

PRO  
1800 North Highland Ave., Suite 472  
Los Angeles, CA 90028

Professional Bull Riders, Inc. (PBR,  
Inc.)  
6 South Tejon Street, Suite 700  
Colorado Springs, CO 80903

Southside Christian Palace Community  
11243 So. Vermont Avenue  
Los Angeles, CA 90044

SWN Productions, LLC  
333 Beichl Avenue, PO Box 683  
Beaver Dam, WI 53916-0683

TCL Inc.  
7165 SW Raleighwood Lane  
Portland, OR 97225

TCT Ministries, INC  
111 Airway Drive  
Marion, IL 62959

The Smiley Group, Inc.  
3870 Crenshaw Blvd.,  
Suite 391  
Los Angeles, CA 90008

The Television Corporation plc  
30 Sackville Street  
London W1S 3DY UK

Thinkfilm Inc.  
2300 Yonge Street, Suite 906  
Toronto Ontario M4P 1E4

Timberwolf Productions, Inc.  
8051 St. Hwy. 34  
Marble Hill MO 63764

United Television LLC  
3890 Indian Ripple Road  
Beavercreek, OH 45440

Whidbey Island Films, Inc.  
3724 Vantage Avenue  
Studio City, CA 91604

Willie Wilson Productions  
4801 Southwick Drive, Suite 601  
Matteson, IL 60443

365

365

**ALL GLOBAL MEDIA  
List of Claimants**

ACME Communications, Inc.  
10829 Olive Blvd., Suite 202  
St. Louis, MO 63141

Bobby Goldstein Productions  
4516 Lovers Lane  
Dallas, TX 75225

C/F International, Inc.  
2112 Eastman Ave., #115  
Ventura, CA 93003

Chesler/Perlmutter Productions Inc.  
129 Yorkville Ave., Ste. 200  
Toronto Ontario M5R 1C4

Cinemaginaire Inc.  
5144, boulevard Saint-Laurent  
Montreal, Quebec H2T 1R8

Collin Siedor (and Subsidiaries)  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

CWK Network, Inc.  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

Debmar/Mercury LLC  
225 Santa Monica Blvd.  
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American Mission Board)  
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365 Bluff Drive  
Winchester, TN 37398  
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20 Kingsley Ave., P.O. Box 476  
Haydenville, MA 01039

Global Response LLC  
5720 Smetana Drive, Ste. 350  
Minnetonka, MN 55343

Good Time Golf Media Group LLC  
P.O. Box 11037  
Boulder, CO 80301

Great Chefs Television GCI Inc.  
P.O. Box 56757  
New Orleans, LA 70156-6756

Green Power Media  
4320 Via Marina, #A  
Marina del Rey, CA 90292

Hollywood Close Ups, Inc.  
4120 St. Clair Avenue  
Studio City, CA 91604

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Associates, Inc.  
38 Miller Avenue  
Mill Valley, CA 94941

Jack Van Impe Ministries  
1718 Northfield Drive  
Rochester Hills, MI 48309

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New York, NY 10024-4761

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Vancouver, BC  
Canada, V6J 1Z6

Mansfield Television Distribution Co.  
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Marina del Rey, CA 90292

Mabinogion Films  
POB 92  
Spencertown, NY 12165

Mark Anthony Productions  
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New York, NY 10018

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Stockton, CA 95212

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Carson City, NV 89703

Nelson Davis Television Productions  
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Santa Monica, CA 90405

New Dimension Media  
680 N. Lake Shore Drive, Suite 900  
Chicago, Illinois 60611

Nightengale Associates, Inc.  
407 Philadelphia Pike  
Wilmington, DE 19809

PRO  
1800 North Highland Ave., Suite 472  
Los Angeles, CA 90028

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Inc.)  
6 South Tejon Street, Suite 700  
Colorado Springs, CO 80903

Southside Christian Palace Community  
11243 So. Vermont Avenue  
Los Angeles, CA 90044

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333 Beichl Avenue, PO Box 683  
Beaver Dam, WI 53916-0683

TCL Inc.  
7165 SW Raleighwood Lane  
Portland, OR 97225

TCT Ministries, INC  
111 Airway Drive  
Marion, IL 62959

The Smiley Group, Inc.  
3870 Crenshaw Blvd.,  
Suite 391  
Los Angeles, CA 90008

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London W1S 3DY UK

Thinkfilm Inc.  
2300 Yonge Street, Suite 906  
Toronto Ontario M4P 1E4

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Marble Hill MO 63764

United Television LLC  
3890 Indian Ripple Road  
Beavercreek, OH 45440

Whidbey Island Films, Inc.  
3724 Vantage Avenue  
Studio City, CA 91604

Willie Wilson Productions  
4801 Southwick Drive, Suite 601  
Matteson, IL 60443

365

## 2014 SATELLITE CLAIMS LIST

<b>Claim No.</b>	<b>Claimant</b>	<b>City</b>	<b>State</b>	<b>Date Received</b>
1	(JOINT) American Society of Composers, Authors and Publishers	New York	NY	7-2-15
2	NASCAR Media Group	Potomac	MD	7-1-15
3	Professional Golfers Association of America (PGA)	Potomac	MD	7-1-15
4	Intersport	Potomac	MD	7-1-15
5	NFL Films	Potomac	MD	7-1-15
6	United States Golf Association (USGA)	Potomac	MD	7-1-15
7	Ladies Professional Golfers Association	Potomac	MD	7-1-15
8	Augusta National Golf Club (The Masters)	Potomac	MD	7-1-15
9	National Football League	Potomac	MD	7-1-15
10	National Basketball Association	Potomac	MD	7-1-15
11	Guthy-Renker LLC	Potomac	MD	7-1-15
12	Women's National Basketball Association	Potomac	MD	7-1-15
13	Babe Winkelman Productions, Inc.	Brainerd	MN	7-1-15
14	(JOINT) National Hockey League	Potomac	MD	7-1-15
15	(JOINT) Hammerman PLLC d/b/a Intermediary (2014 Program Suppliers Satellite Joint)	Washington	DC	7-1-15
16	Hammerman PLLC d/b/a Intermediary (2014 MLS Satellite); Major League Soccer	Washington	DC	7-1-15
17	Hammerman PLLC d/b/a Intermediary (2014 Gray TV Satellite); Gray Television Inc.	Washington	DC	7-1-15
18	Hammerman PLLC d/b/a Intermediary (2014 A&E Satellite); A&E Television Networks, LLC	New York	NY	7-1-15
19	KATC Communications, LLC	Lafayette	LA	7-1-15
20	WPSD-TV, LLC	Paducah	KY	7-1-15
21	Dick Clark Productions, Inc.	Santa Monica	CA	7-1-15
22	WSYX Licensee, Inc.; Rick White	Columbus	OH	7-2-15
23	Columbus (WTTE-TV) Licensee, Inc.; Rick White	Columbus	OH	7-2-15
24	Multimedia Holdings Corporation, licensee of KARE(TV)	McLean	VA	7-2-15
25	Manhan Media, Inc.; Rick White	Columbus	OH	7-2-15
26	John F. Kennedy Center for the Performing Arts	Washington	DC	7-2-15
27	(JOINT) Hammerman PLLC d/b/a Intermediary (2014 Devotional Satellite Joint)	Washington	DC	7-2-15



28	(JOINT) Conexion Media Group PLC	London	UK	7-3-15
29	(JOINT) Broadcast Music, Inc.	New York	NY	7-6-15
30	(JOINT) NBC Universal Media, LLC	New York	NY	7-6-15
31	(JOINT) Compact Collections Limited	London	UK	7-6-15
32	(JOINT) CBS Studios Inc., a CBS Company	Santa Monica	CA	7-6-15
33	Lee Mendelson Film Productions, Inc; Peanuts Worldwide LLC	Burlingame	CA	7-7-15
34	WTVH License, Inc. d/b/a WTVH(TV)	Syracuse	NY	7-7-15
35	ITV Studios, Inc.; Upper Ground Enterprises, Inc., c/o Corporation Trust Company	Sherman Oaks	CA	7-7-15
36	Scholastic Entertainment Inc.	New York	NY	7-7-15
37	Carsey Werner	Encino	CA	7-7-15
38	WCAU, Subsidiary of NBCUniversal Media, LLC	Bala Cynwyd	PA	7-7-15
39	GB Entertainment, LLC	Potomac	MD	7-7-15
40	WNBC, NBC Universal Media, LLC	New York	NY	7-7-15
41	WRC-TV	Washington	DC	7-7-15
42	(JOINT) CBS Broadcasting Inc.; Sacramento Television Stations Inc.; CBL Corporation; Pittsburgh Television Station WPCW Inc.	New York	NY	7-10-15
43	(JOINT) The Goodman Group, LLC	Mars	PA	7-10-15
44	(JOINT) Fintage Audiovisual Rights B.V.	Leiden	Netherlands	7-13-15
45	(JOINT) MG Perin, Inc.; Marty Stouffer Productions Ltd.	New York	NY	7-13-15
46	WBNG, Inc.	Johnson City	NY	7-13-15
47	IMG, Inc., (International Management Group)	Potomac	MD	7-14-15
48	NUMBER NOT USED			7-14-15
49	(JOINT) Fox Entertainment Group, Inc.	Los Angeles	CA	7-14-15
50	CF Entertainment, Inc.	Beverly Hills	CA	7-14-15
51	Jonathan T. McCants, Esq.; In Touch Ministries, Inc.	Atlanta	GA	7-14-15
52	WLBT, LLC	Jackson	MS	7-14-15
53	(JOINT) Vine Library Company LP; Vine Gaylord Company LP; vine Rysher Company LP; Vine Entertainment LP	New York	NY	7-14-15
54	Gammon & Grange, PC; Challenger Films Corporation	McLean	VA	7-14-15
55	(JOINT) CBS Broadcasting Inc.; Pottle Productions, Inc.; Sacramento Television Stations Inc.; CBS Corporation; Pittsburgh Television Station WPCW Inc.; CBS Operations Inc.	New York	NY	7-15-15

56	Academy of Motion Picture Arts and Sciences	Beverly Hills	CA	7-15-15
57	SAG-AFTRA; Swissperform; AISGE; ADAMI	Los Angeles	CA	7-15-15
58	World Wrestling Entertainment, Inc.	Stamford	CT	7-15-15
59	Hometime Video Publishing Inc.	Chaska	MN	7-15-15
60	Direct Delivery Specialist	Los Angeles	CA	7-15-15
61	Steve Rotfeld Productions, Inc.	Bryn Mawr	PA	7-15-15
62	Schulberg Media Works	Los Angeles	CA	7-15-15
63	Jockey International, Inc.	Los Angeles	CA	7-15-15
64	Direct Delivery Specialists	Los Angeles	CA	7-15-15
65	Murad, Inc.	Los Angeles	CA	7-15-15
66	Videoindiana, Inc.	Indianapolis	IN	7-16-15
67	BBC Worldwide Americas, Inc.	New York	NY	7-16-15
68	(JOINT) Bellum Entertainment; Longneedle Entertainment	Burbank	CA	7-16-15
69	USA Track & Field, Inc.	Indianapolis	IN	7-16-15
70	(JOINT) Metro-Goldwyn-Mayer Studios Inc.	Beverly Hills	CA	7-16-15
71	David Powell Jr.	Miami	FL	7-17-15
72	(JOINT) FBI; David Powell; Dir James Comey	Miramar	FL	7-17-15
73	(JOINT) Roxanne Modjallal	Burbank	CA	7-17-15
74	(JOINT) Paramount Pictures Corporation; Melange Picktures, LLC c/o Paramount Pictures Corporation; DW Studios L.L.C. f/k/a DreamWorks L.L.C. c/o Paramount Pictures Corporation	Los Angeles	CA	7-20-15
75	WMC Holdings, LLC; Raycom Media Inc.	Memphis	TN	7-20-15
76	WTVH License, Inc. d/b/a WTVH(TV); Sinclair Communications LLC	Syracuse	NY	7-20-15

77	Jeopardy Productions, Inc.	Culver City	CA	7-20-15
78	Zuffa, LLC	Las Vegas	NV	7-20-15
79	Telco Productions, Inc.	Santa Monica	CA	7-21-15
80	Califon Productions, Inc.	Culver City	CA	7-20-15
81	(JOINT) Sony Pictures Television Inc.	Culver City	CA	7-20-15
82	SFM Entertainment LLC; Fred Rappoport	Rye Brook	NY	7-21-15
83	4K Media, Inc.	New York	NY	7-21-15
84	Meredith Corporation, licensee of TV station KCTV	Fairway	KS	7-21-15
85	WOAI Licensee, LLC	San Antonio	TX	7-21-15
86	(JOINT) Marty Stouffer Productions, Ltd.; MG Perin, Inc.	Aspen	CO	7-21-15
87	Automobile Club of Southern California	Costa Mesa	CA	7-21-15
88	WHEC-TV, LLC, Licensee of WHEC-TV	St. Paul	MN	7-21-15
89	KSTP-TV, LLC, Licensee of KSTP-TV	St. Paul	MN	7-21-15
90	San Antonio Television, LLC	San Antonio	TX	7-21-15
91	(JOINT) Office of the Commissioner of Baseball	New York	NY	7-22-15
92	(JOINT) ole Media Management LP	Ontario	Canada	7-22-15
93	Pacific Family Entertainment	Santa Ana	CA	7-22-15
94	Media General Holdings, LLC on behalf of WJTV	Richmond	VA	7-22-15
95	WAFF License Subsidiary LLC	Montgomery	AL	7-22-15
96	Tamera Reub; U.S. Olympic Committee	Colorado Springs	CO	7-23-15
97	Pacific and Southern, LLC licensee of WLBZ (TV)	McLean	VA	7-23-15
98	Esteem Broadcasting of North Carolina LLC	New Bern	NC	7-23-15
99	North Carolina License Holdings, Inc.	New Bern	NC	7-23-15

100	Fox Television Stations, LLC, licensee of WNYW1	Washington	DC	7-23-15
101	Fox Television Stations, LLC, licensee of WNYW	Washington	DC	7-23-15
102	(JOINT) IFTA Collections, a division of the Independent Film & Television Alliance	Los Angeles	CA	7-24-15
103	Gammon & Grange, P.C.; International Fellowship of Christians & Jews, Inc.	McLean	VA	7-24-15
104	Litton Syndications, Inc.	Mount Pleasant	SC	7-24-15
105	KNBC, Subsidiary of NBCUniversal Media, LLC	Universal City	CA	7-24-15
106	(JOINT) All Global Media, LLC	Santa Monica	CA	7-26-15
107	WBOY-TV, LLC; West Virginia Media Holdings, LLC licensee of WBOY-TV	Clarksburg	WV	7-27-15
108	Bangor Communications, Inc.	Bangor	ME	7-27-15
109	Fox Television Stations, LLC, licensee of KTTV1	Washington	DC	7-27-15
110	Fox Television Stations, LLC, licensee of KTTV	Washington	DC	7-27-15
111	Fox Television Stations, LLC, licensee of WWOR-TV	Washington	DC	7-27-15
112	Chesapeake Media I LLC WEYI	Clio	MI	7-27-15
113	Fox Television Stations, LLC, Licensee of KTVU	Washington	DC	7-27-15
114	SCG Characters, LLC	Los Angeles	CA	7-27-15
115	The Christian Broadcasting Network, Inc.	Virginia Beach	VA	7-27-15
116	KGO Television, Inc.	New York	NY	7-27-15
117	(JOINT) American Broadcasting Companies, Inc.; A.K.A. Productions, Inc., TVP; Lincoln Square Productions, LLC; Victor TV Productions; Greengrass Productions, Inc.; Marvel Television, Inc.; ABC Studios; Keep Calm and Carry On Productions, Inc.	New York	NY	7-27-15
118	American Broadcasting Companies, Inc.	New York	NY	7-27-15
119	ABC Holding Company, Inc.	New York	NY	7-27-15

120	WBNS-TV, licensee of television station WBNS-TV	Columbus	OH	7-28-15
121	The Weather Channel, LLC	Atlanta	GA	7-28-15
122	(JOINT) Univision Communications Inc.	Los Angeles	CA	7-28-15
123	Monica L. Dias; Scripps Media, Inc., licensee of KMCI-TV	Cincinnati	OH	7-28-15
124	Stacey Valenza	New York	NY	7-28-15
125	Monica L. Dias; Scripps Media, Inc., licensee of KSHB-TV	Cincinnati	OH	7-28-15
126	Monica L. Dias; Scripps Media, Inc., licensee of WXYZ-TV	Cincinnati	OH	7-28-15
127	Monica L. Dias; Scripps Media, Inc., licensee of WMYD	Cincinnati	OH	7-28-15
128	Monica L. Dias; Scripps Media, Inc., licensee of WRTV	Cincinnati	OH	7-28-15
129	Monica L. Dias; Scripps Media, Inc., licensee of KNXV-TV	Cincinnati	OH	7-28-15
130	Monica L. Dias; Newschannel 5 Network, LLC licensee of WTVF c/o Scripps Media, Inc.	Cincinnati	OH	7-28-15
131	Monica L. Dias; Journal Broadcast Corporation, licensee of WTMJ-TV c/o Scripps Media, Inc.	Cincinnati	OH	7-28-15
132	Monica L. Dias; Journal Broadcast Corporation, licensee of WGBA-TV c/o Scripps Media, Inc.	Cincinnati	OH	7-28-15
133	Monica L. Dias; Journal Broadcast Corporation, licensee of WFTX-TV c/o Scripps Media	Cincinnati	OH	7-28-15
134	Monica L. Dias; Journal Broadcast Corporation, licensee of WACY-TV c/o Scripps Media	Cincinnati	OH	7-28-15
135	(JOINT) SESAC, Inc.	Nashville	TN	7-28-15
136	Rescue 3 TV, LLC	Los Angeles	CA	7-28-15
137	(JOINT) Jacqueline Eddy c/o Disney; Buena Vista Television; Touchstone Television; ABC Family; ABC Cable Networks Group; ABC Studios; MVL Film Finance LLC (aka Marvel); Disney-ABC Domestic Television; Disney Enterprises, Inc.; Walt Disney Studios; Lucasfilm LTD	Burbank	CA	7-28-15

138	(JOINT) Arnold P. Lutzker	Washington	DC	7-28-15
139	WREG, LLC	Memphis	TN	7-28-15
140	WGN Continental Broadcasting Company, LLC	Chicago	IL	7-28-15
141	Ivy Classics, Inc.	Asheville	NC	7-29-15
142	CNBC LLC	Englewood Cliffs	NJ	7-29-15
143	WWAY-TV, LLC`	Wilmington	NC	7-29-15
144	Connection III Entertainment Corp.	Los Angeles	CA	7-29-15
145	WAPT Hearst Television, Inc., licensee of WAPT(TV)	New York	NY	7-29-15
146	Hearst Stations Inc., on behalf of WBAL-TV	New York	NY	7-29-15
147	WDCW, LLC	Washington	DC	7-29-15
148	Hearst Stations Inc., on behalf of WMUR-TV	New York	NY	7-30-15
149	Hearst Stations Inc., on behalf of WNNE (TV)	New York	NY	7-30-15
150	Hearst Stations Inc., on behalf of WXII-TV	New York	NY	7-30-15
151	Nexstar Broadcasting, Inc., licensee of WHAG	Irving	TX	7-30-15
152	Nexstar Broadcasting, Inc., licensee of WLMT	Irving	TX	7-30-15
153	Nexstar Broadcasting, Inc., licensee of WFFF	Irving	TX	7-30-15
154	Screen Media Ventures, LLC	New York	NY	7-30-15
155	Mission Broadcasting, Inc., licensee of WVNY	West Lake	OH	7-30-15
156	Oliver Productions, Inc.	Washington	DC	7-30-15
157	WAOW-WYOW Television, Inc., licensee of WAOW(TV)	Wausau	WI	7-30-15
158	WAOW-WYOW Television, Inc., licensee of WYOW(TV)	Wausau	WI	7-30-15
159	Monica L. Dias; Journal Broadcast Corporation, licensee of KMTV-TV c/o Scripps Media, Inc.	Cincinnati	OH	7-30-15

160	Graham Media Group, San Antonio, Inc.	San Antonio	TX	7-30-15
161	Hearst Stations Inc., licensee of WPTZ(TV)	New York	NY	7-30-15
162	KWGN, LLC	Denver	CO	7-30-15
163	WPIX, LLC	New York	NY	7-30-15
164	KTLA, LLC	Los Angeles	CA	7-30-15
165	Tribune Entertainment Company, LLC; Tribune Broadcasting Company, LLC	Chicago	IL	7-30-15
166	Tribune Television, New Orleans, Inc. (for station WNOL-TV)	Metairie	LA	7-30-15
167	(JOINT) Erin Larkin; Endemol Nederland B.V.	Shepherds Bush	London	7-31-15
168	Louisiana Television Broadcasting, LLC, licensee of WBRZ-TV	Baton Rouge	LA	7-31-15
169	Graham Media Group, San Antonio, Inc.	San Antonio	TX	7-31-15
170	Winston Broadcasting Network, licensee of WBNX-TV	Cuyahoga Falls	OH	7-31-15
171	Tanana Valley Television Company, licensee of KFXF(TV)	Fairbanks	AK	7-31-15
172	Tanana Valley Television Company, licensee of K13XD-D	Fairbanks	AK	7-31-15
173	Hearst Stations Inc., on behalf of WCVB- TV	New York	NY	7-31-15
174	Farm Journal Broadcast	South Bend	IN	7-31-15
175	Tribune Broadcasting Indianapolis, LLC (for Station WXIN)_	Indianapolis	IN	7-31-15
176	Tribune Broadcasting Indianapolis, LLC (Fro Station WTTV)	Indianapolis	IN	7-31-15
177	EMI Music Publishing Ltd; EMI Music Publishing Ltd obo Kirk Shaw Productions Inc.	London	UK	7-31-15
178	LIN Television Corporation, on behalf of WDTN-TV	Indianapolis	IN	7-31-15
179	WBDT Television, LLC, on behalf of WBDT-TV	Indianapolis	IN	7-31-15
180	NBC Bay Area KNTB	San Jose	CA	7-31-15
181	LIN Television Corporation, on behalf of WISH-TV	Indianapolis	IN	7-31-15

182	(JOINT) Fintage Audiovisual Rights B.V.	Leiden	The Netherlands	7-31-15
183	(JOINT) National Collegiate Athletic Association	Indianapolis	IN	7-31-15
184	(JOINT) COMPACT	London	UK	7-31-15
185	Gregory H. Guillot, Esq.; Word of God Fellowship, Inc., d/b/a Daystar Television Network	Dallas	TX	7-31-15
186	Mark Gerard Obrien	Newport Beach	CA	7-31-15
187	(JOINT) Egeda	Madrid	Spain	7-31-15
188	PGA Tour, Inc. (AMENDED)	Point Verde Beach	FL	



**Blaine, Anita**

---

**From:** kormond@allglobalmedia.biz  
**Sent:** Friday, July 22, 2016 12:07 PM  
**To:** CableClaims  
**Subject:** Cable Joint Claim from ALL GLOBAL MEDIA, LLC  
**Attachments:** AGM\_List\_of\_Claimants\_July\_2016.pdf

**Joint Claim for Cable Retransmission Royalty Fees**

In accordance with section 111 of the Copyright Act, 17 U.S.C., and Subpart A of Part 360 of the Copyright Royalty Board regulations (37 CFR 360.1-360.5) the copyright owner claimant named herein files with the Copyright Royalty Board a claim to royalty payments collected from cable television systems retransmitting copyrighted programming contained on over-the-air television and radio broadcast signals.

**Filer's full name:**

ALL GLOBAL MEDIA, LLC

**Filer's full address:**

1158 26TH STREET, #670  
SANTA MONICA, CA 90403  
USA

**Telephone number of person or entity filing the claim:**

310-828-8245

**Fax number, if any, of person or entity filing the claim:**

781-823-7977

**Email:**

[kormond@allglobalmedia.biz](mailto:kormond@allglobalmedia.biz)

**Contact Person:**

K. Ormond

**Phone:**

310-828-8245

**Fax:**

781-823-7977

**Email:**

647

[info@allglobalmedia.biz](mailto:info@allglobalmedia.biz)

Full legal names and addresses of the copyright owners. The copyright owners listed below have duly authorized the person or entity named herein to file this claim on their behalf.:

**SEE ATTACHED LIST**

AGM List of Claimants July 2016.pdf

A general statement of the nature of the copyright owners' works (e.g., motion pictures, syndicated television series, devotional, sports broadcasts, music, news, other station-produced programming.):

TV Programs (e.g., on public TV)

Example(s): Below, provide at least one example of a secondary retransmission of either a non-music (Example A) or music (Example B) work by filling in the blanks.

Example A (Non-Music): The copyrighted broadcast program TAVIS SMILEY, which is owned by SMILEY GROUP was the subject of a primary transmission made by broadcast station KACV, which is licensed to the city of AMARILLO, located in the state of TX, on JULY 1, 2015 and was retransmitted by cable system CEQUEL COMMUNICATIONS, which serves the community of (city) CLOVIS, (state) NM.

Claim submitted at 12:07 on 7/22/16. There is 1 attached file.

**ALL GLOBAL MEDIA  
List of Claimants**

647  
ACME Communications, Inc.  
10829 Olive Blvd., Suite 202  
St. Louis, MO 63141

Bobby Goldstein Productions  
4516 Lovers Lane  
Dallas, TX 75225

C/F International, Inc.  
2112 Eastman Ave., #115  
Ventura, CA 93003

Chesler/Perlmutter Productions Inc.  
129 Yorkville Ave., Ste. 200  
Toronto Ontario M5R 1C4

Cinemaginaire Inc.  
5144, boulevard Saint-Laurent  
Montreal, Quebec H2T 1R8

Collin Siedor (and Subsidiaries)  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

CWK Network, Inc.  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

Debmar/Mercury LLC  
225 Santa Monica Blvd.  
8<sup>th</sup> Floor  
Santa Monica, CA 90401

Eagle Media  
22 Armoury Way  
London SW18 1EZ UK

Epiphany Pictures, Inc.  
10625 Esther Ave  
Los Angeles, CA 90064

FamilyNet, Inc. (aka Media  
Technologies Group and Broadcast  
Communications Group of the North  
American Mission Board)  
6350 West Freeway  
Forth Worth, TX 76116

Fishing University LLC  
365 Bluff Drive  
Winchester, TN 37398  
Florentine Films/Hott Productions  
20 Kingsley Ave., P.O. Box 476  
Haydenville, MA 01039

Global Response LLC  
5720 Smetana Drive, Ste. 350  
Minnetonka, MN 55343

Good Time Golf Media Group LLC  
P.O. Box 11037  
Boulder, CO 80301

Great Chefs Television GCI Inc.  
P.O. Box 56757  
New Orleans, LA 70156-6756

Green Power Media  
4320 Via Marina, #A  
Marina del Rey, CA 90292

Hollywood Close Ups, Inc.  
4120 St. Clair Avenue  
Studio City, CA 91604

Independent Communications  
Associates, Inc.  
38 Miller Avenue  
Mill Valley, CA 94941

Jack Van Impe Ministries  
1718 Northfield Drive  
Rochester Hills, MI 48309

JMJ Films Inc.  
11 West 84<sup>th</sup> Street, #4  
New York, NY 10024-4761

Mainframe Entertainment  
2025 West Broadway, Suite 200  
Vancouver, BC  
Canada, V6J 1Z6

Mansfield Television Distribution Co.  
13924 Panay Way, P-604  
Marina del Rey, CA 90292

Mabinogion Films  
POB 92  
Spencertown, NY 12165

Mark Anthony Productions  
1375 Broadway, 21st Floor  
New York, NY 10018

647

**ALL GLOBAL MEDIA**  
**List of Claimants**

M. Entertainment  
10662 Chanel Lane  
Stockton, CA 95212

Money.net.TV Inc.  
251 Jeanell Drive, #3  
Carson City, NV 89703

Nelson Davis Television Productions  
2809 2nd Street, Suite 2  
Santa Monica, CA 90405

New Dimension Media  
680 N. Lake Shore Drive, Suite 900  
Chicago, Illinois 60611

Nightengale Associates, Inc.  
407 Philadelphia Pike  
Wilmington, DE 19809

PRO  
1800 North Highland Ave., Suite 472  
Los Angeles, CA 90028

Professional Bull Riders, Inc. (PBR,  
Inc.)  
6 South Tejon Street, Suite 700  
Colorado Springs, CO 80903

Southside Christian Palace Community  
11243 So. Vermont Avenue  
Los Angeles, CA 90044

SWN Productions, LLC  
333 Beichl Avenue, PO Box 683  
Beaver Dam, WI 53916-0683

TCL Inc.  
7165 SW Raleighwood Lane  
Portland, OR 97225

TCT Ministries, INC  
111 Airway Drive  
Marion, IL 62959

The Smiley Group, Inc.  
3870 Crenshaw Blvd.,  
Suite 391  
Los Angeles, CA 90008

The Television Corporation plc  
30 Sackville Street  
London W1S 3DY UK

Thinkfilm Inc.  
2300 Yonge Street, Suite 906  
Toronto Ontario M4P 1E4

Timberwolf Productions, Inc.  
8051 St. Hwy. 34  
Marble Hill MO 63764

United Television LLC  
3890 Indian Ripple Road  
Beavercreek, OH 45440

Whidbey Island Films, Inc.  
3724 Vantage Avenue  
Studio City, CA 91604

Willie Wilson Productions  
4801 Southwick Drive, Suite 601  
Matteson, IL 60443

**Blaine, Anita**

---

**From:** kormond@allglobalmedia.biz  
**Sent:** Friday, July 22, 2016 12:59 PM  
**To:** SATClaims  
**Subject:** Satellite Joint Claim from ALL GLOBAL MEDIA, LLC  
**Attachments:** AGM\_List\_of\_Claimants\_July\_2016.pdf

Joint Claim for Satellite Retransmission Royalty Fees

In accordance with section 119 of the Copyright Act, 17 U.S.C., and Subpart B of Part 360 of the Copyright Royalty Board regulations (37 CFR 360.10-360.15) the copyright owner claimants named herein file with the Copyright Royalty Board a claim to royalty payments collected from satellite television carriers retransmitting copyrighted programming contained on over-the-air television broadcast signals.

Filer's full name:

ALL GLOBAL MEDIA, LLC

Filer's full address:

1158 26TH STREET, #670  
SANTA MONICA, CA 90403  
USA

Telephone number of person or entity filing the claim:

310-828-8245

Fax number, if any, of person or entity filing the claim:

781-823-7977

Email:

[kormond@allglobalmedia.biz](mailto:kormond@allglobalmedia.biz)

Contact Person:

K. Ormond

Phone:

310-828-8245

Fax:

781-823-7977

Email:

[info@allglobalmedia.biz](mailto:info@allglobalmedia.biz)

Full legal names and addresses of the copyright owners. The copyright owners listed below have duly authorized the person or entity named herein to file this claim on their behalf.:

See Attached List

AGM List of Claimants July 2016.pdf

A general statement of the nature of the copyright owners' works (e.g., motion pictures, syndicated television series, devotional, sports broadcasts, music, news, other station-produced programming.):

TV Programs (e.g. on satellite)

Example(s): Below, provide at least one example of a secondary retransmission of either a non-music (Example A) or music (Example B) work by filling in the blanks.

Example A (Non-Music): The copyrighted broadcast program PROFESSIONAL BULL RIDERS, which is owned by PROFESSIONAL BULL RIDING (AKA: PBR) was the subject of a primary transmission made by broadcast station CBS, which is licensed to the city of NEW YORK, located in the state of NY, on JANUARY 18, 2015 and was retransmitted by satellite carrier DIRECTV to subscribers outside that station's local market.

Claim submitted at 12:59 on 7/22/16. There is 1 attached file.

**ALL GLOBAL MEDIA  
List of Claimants**

ACME Communications, Inc.  
10829 Olive Blvd., Suite 202  
St. Louis, MO 63141

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Dallas, TX 75225

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Ventura, CA 93003

Chesler/Perlmutter Productions Inc.  
129 Yorkville Ave., Ste. 200  
Toronto Ontario M5R 1C4

Cinemaginaire Inc.  
5144, boulevard Saint-Laurent  
Montreal, Quebec H2T 1R8

Collin Siedor (and Subsidiaries)  
6285 Barfield Road, Second Floor  
Atlanta, GA 30328

CWK Network, Inc.  
6285 Barfield Road, Second Floor  
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8<sup>th</sup> Floor  
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London SW18 1EZ UK

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Los Angeles, CA 90064

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Communications Group of the North  
American Mission Board)  
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Forth Worth, TX 76116

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365 Bluff Drive  
Winchester, TN 37398  
Florentine Films/Hott Productions  
20 Kingsley Ave., P.O. Box 476  
Haydenville, MA 01039

Global Response LLC  
5720 Smetana Drive, Ste. 350  
Minnetonka, MN 55343

Good Time Golf Media Group LLC  
P.O. Box 11037  
Boulder, CO 80301

Great Chefs Television GCI Inc.  
P.O. Box 56757  
New Orleans, LA 70156-6756

Green Power Media  
4320 Via Marina, #A  
Marina del Rey, CA 90292

Hollywood Close Ups, Inc.  
4120 St. Clair Avenue  
Studio City, CA 91604

Independent Communications  
Associates, Inc.  
38 Miller Avenue  
Mill Valley, CA 94941

Jack Van Impe Ministries  
1718 Northfield Drive  
Rochester Hills, MI 48309

JMJ Films Inc.  
11 West 84<sup>th</sup> Street, #4  
New York, NY 10024-4761

Mainframe Entertainment  
2025 West Broadway, Suite 200  
Vancouver, BC  
Canada, V6J 1Z6

Mansfield Television Distribution Co.  
13924 Panay Way, P-604  
Marina del Rey, CA 90292

Mabinogion Films  
POB 92  
Spencertown, NY 12165

Mark Anthony Productions  
1375 Broadway, 21st Floor  
New York, NY 10018

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Santa Monica, CA 90405

New Dimension Media  
680 N. Lake Shore Drive, Suite 900  
Chicago, Illinois 60611

Nightengale Associates, Inc.  
407 Philadelphina Pike  
Wilmington, DE 19809

PRO  
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Los Angeles, CA 90028

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Inc.)  
6 South Tejon Street, Suite 700  
Colorado Springs, CO 80903

Southside Christian Palace Community  
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Los Angeles, CA 90044

SWN Productions, LLC  
333 Beichl Avenue, PO Box 683  
Beaver Dam, WI 53916-0683

TCL Inc.  
7165 SW Raleighwood Lane  
Portland, OR 97225

TCT Ministries, INC  
111 Airway Drive  
Marion, IL 62959

The Smiley Group, Inc.  
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Los Angeles, CA 90008

The Television Corporation plc  
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United Television LLC  
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Beavercreek, OH 45440

Whidbey Island Films, Inc.  
3724 Vantage Avenue  
Studio City, CA 91604

Willie Wilson Productions  
4801 Southwick Drive, Suite 601  
Matteson, IL 60443

## 2016 Cable TV claim

[← Return to claims list](#)

Claim number	190
Date received	07-18-2017
Filer	All Global Media, LLC 1158 25th Street, #670 Santa Monica, CA 90403 <b>Phone:</b> 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Claimants	<a href="#">Claimant list</a>
Primary contact	K Ormond <b>Phone:</b> 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Nature of copyright owners' works	television programs

ACME Communications, Inc.  
10829 Olive Blvd., Suite 202  
St. Louis, MO 63141

Bobby Goldstein Productions  
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Dallas, TX 75225

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Atlanta, GA 30328

CWK Network, Inc.  
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Los Angeles, CA 90064

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Communications Group of the North  
American Mission Board)  
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Forth Worth, TX 76116

Fishing University LLC  
365 Bluff Drive  
Winchester, TN 37398  
Florentine Films/Hott Productions  
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Haydenville, MA 01039

Global Response LLC  
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Good Time Golf Media Group LLC  
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Great Chefs Television GCI Inc.  
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New Orleans, LA 70156-6756

Green Power Media  
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Marina del Rey, CA 90292

Hollywood Close Ups, Inc.  
4120 St. Clair Avenue  
Studio City, CA 91604

Independent Communications  
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38 Miller Avenue  
Mill Valley, CA 94941

Jack Van Impe Ministries  
1718 Northfield Drive  
Rochester Hills, MI 48309

JMJ Films Inc.  
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New York, NY 10024-4761

Mainframe Entertainment  
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Canada, V6J 1Z6

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13924 Panay Way, P-604  
Marina del Rey, CA 90292

Mabinogion Films  
POB 92  
Spencertown, NY 12165

Mark Anthony Productions  
1375 Broadway, 21st Floor  
New York, NY 10018



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Wilmington, DE 19809

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Colorado Springs, CO 80903

Southside Christian Palace Community  
11243 So. Vermont Avenue  
Los Angeles, CA 90044

SWN Productions, LLC  
333 Beichl Avenue, PO Box 683  
Beaver Dam, WI 53916-0683

TCL Inc.  
7165 SW Raleighwood Lane  
Portland, OR 97225

TCT Ministries, INC  
111 Airway Drive  
Marion, IL 62959

The Smiley Group, Inc.  
3870 Crenshaw Blvd.,  
Suite 391  
Los Angeles, CA 90008

The Television Corporation plc  
30 Sackville Street  
London W1S 3DY UK

Thinkfilm Inc.  
2300 Yonge Street, Suite 906  
Toronto Ontario M4P 1E4

Timberwolf Productions, Inc.  
8051 St. Hwy. 34  
Marble Hill MO 63764

United Television LLC  
3890 Indian Ripple Road  
Beavercreek, OH 45440

Whidbey Island Films, Inc.  
3724 Vantage Avenue  
Studio City, CA 91604

Willie Wilson Productions  
4801 Southwick Drive, Suite 601  
Matteson, IL 60443

## 2016 Satellite TV claim

[← Return to claims list](#)

Claim number	118
Date received	07-18-2017
Filer	All Global Media, LLC 1158 25th Street, #670 Santa Monica, CA 90403 <b>Phone:</b> 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Claimants	<a href="#">Claimant list</a>
Primary contact	K Ormond <b>Phone:</b> 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Nature of copyright owners' works	television programs

ACME Communications, Inc.  
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St. Louis, MO 63141

Bobby Goldstein Productions  
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Chesler/Perlmutter Productions Inc.  
129 Yorkville Ave., Ste. 200  
Toronto Ontario M5R 1C4

Cinemaginaire Inc.  
5144, boulevard Saint-Laurent  
Montreal, Quebec H2T 1R8

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Los Angeles, CA 90064

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6350 West Freeway  
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Fishing University LLC  
365 Bluff Drive  
Winchester, TN 37398  
Florentine Films/Hott Productions  
20 Kingsley Ave., P.O. Box 476  
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Global Response LLC  
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Good Time Golf Media Group LLC  
P.O. Box 11037  
Boulder, CO 80301

Great Chefs Television GCI Inc.  
P.O. Box 56757  
New Orleans, LA 70156-6756

Green Power Media  
4320 Via Marina, #A  
Marina del Rey, CA 90292

Hollywood Close Ups, Inc.  
4120 St. Clair Avenue  
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Mill Valley, CA 94941

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Rochester Hills, MI 48309

JMJ Films Inc.  
11 West 84<sup>th</sup> Street, #4  
New York, NY 10024-4761

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Canada, V6J 1Z6

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Marina del Rey, CA 90292

Mabinogion Films  
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Spencertown, NY 12165

Mark Anthony Productions  
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**ALL GLOBAL MEDIA**  
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Whidbey Island Films, Inc.  
3724 Vantage Avenue  
Studio City, CA 91604

Willie Wilson Productions  
4801 Southwick Drive, Suite 601  
Matteson, IL 60443

## 2017 Cable TV claim

[← Return to claims list](#)

Claim number	233
Date received	07-23-2018
Filer	K Ormond All Global Media 1158 25th Street, #670 Santa Monica, CA 90403 Phone: 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Claimants	<a href="#">Claimant list</a>
Primary contact	K Ormond Phone: 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Nature of copyright owners' works	Motion pictures, syndicated television series, devotional programs, sports broadcasts, television programs

<b>ALL GLOBAL MEDIA, LLC</b>	
<b>Claimants list</b>	
<b><u>Claimant Name</u></b>	<b><u>Address</u></b>
ACME Communications, Inc.	10829 Olive Blvd., Suite 202, St. Louis, MO 63141
Bobby Goldstein Productions	4516 Lovers Lane, Dallas, TX 75225
C/F International, Inc.	2112 Eastman Ave., #115, Ventura, CA 93003
Chesler/Perlmutter Productions Inc.	129 Yorkville Ave., Ste. 200, Toronto Ontario M5R 1C4
Cinemaginaire Inc.	5144, boulevard Saint-Laurent, Montreal, Quebec H2T 1R8
Collin Sedor (and Subsidiaries)	6285 Barfield Road, Second Floor, Atlanta, GA 30328
CWK Network, Inc.	6285 Barfield Road, Second Floor, Atlanta, GA 30328
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Global Response LLC	5720 Smetana Drive, Ste. 350, Minnetonka, MN 55343
Good Time Golf Media Group LLC	P.O. Box 11037, Boulder, CO 80301
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Green Power Media	4320 Via Marina, #A, Marina del Rey, CA 90292
Hollywood Close Ups, Inc.	4120 St. Clair Avenue, Studio City, CA 91604
Independent Communications Associates, Inc.	38 Miller Avenue, Mill Valley, CA 94941
Jack Van Impe Ministries	1718 Northfield Drive, Rochester Hills, MI 48309
JMJ Films Inc.	11 West 84 <sup>th</sup> Street, #4, New York, NY 10024-4761
Mainframe Entertainment	2025 West Broadway, Suite 200, Vancouver, BC, Canada, V6J 1Z6
Mansfield Television Distribution Co.	13924 Panay Way, P-604, Marina del Rey, CA 90292
Mabinogion Films	POB 92, Spencertown, NY 12165
Mark Anthony Productions	1375 Broadway, 21st Floor, New York, NY 10018
M. Entertainment	10662 Chanel Lane, Stockton, CA 95212
Money.net.TV Inc.	251 Jeanell Drive, #3, Carson City, NV 89703
Nelson Davis Television Productions	2809 2nd Street, Suite 2, Santa Monica, CA 90405
New Dimension Media	680 N. Lake Shore Drive, Suite 900, Chicago, Illinois 60611
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TCT Ministries, INC	111 Airway Drive, Marion, IL 62959
The Smiley Group, Inc.	3870 Crenshaw Blvd., Suite 391, Los Angeles, CA 90008
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Thinkfilm Inc.	2300 Yonge Street, Suite 906, Toronto Ontario M4P 1E4
Timberwolf Productions, Inc.	8051 St. Hwy. 34, Marble Hill MO 63764
United Television LLC	3890 Indian Ripple Road, Beavercreek, OH 45440
Whidbey Island Films, Inc.	3724 Vantage Avenue, Studio City, CA 91604
Willie Wilson Productions	4801 Southwick Drive, Suite 601, Matteson, IL 60443

## 2017 Satellite TV claim

[← Return to claims list](#)

Claim number	136
Date received	07-23-2018
Filer	K Ormond All Global Media 1158 25th Street, #670 Santa Monica, CA 90403 Phone: 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Claimants	<a href="#">Claimant list</a>
Primary contact	K Ormond Phone: 310-828-8245 <a href="mailto:kormond@allglobalmedia.biz">kormond@allglobalmedia.biz</a>
Nature of copyright owners' works	Motion pictures, syndicated television series, devotional programs, sports broadcasts, television programs

<b>ALL GLOBAL MEDIA, LLC</b>	
<b>Claimants list</b>	
<b><u>Claimant Name</u></b>	<b><u>Address</u></b>
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Chesler/Perlmutter Productions Inc.	129 Yorkville Ave., Ste. 200, Toronto Ontario M5R 1C4
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Debmar/Mercury LLC	225 Santa Monica Blvd., 8th Floor, Santa Monica, CA 90401
Eagle Media	22 Armoury Way, London SW18 1EZ UK
Epiphany Pictures, Inc.	10625 Esther Ave, Los Angeles, CA 90064
FamilyNet, Inc. (aka Media Technologies Group and Broadcast Communications Group of the North American Mission Board)	6350 West Freeway, Forth Worth, TX 76116
Fishing University LLC	365 Bluff Drive, Winchester, TN 37398
Florentine Films/Hott Productions	20 Kingsley Ave., P.O. Box 476, Haydenville, MA 01039
Global Response LLC	5720 Smetana Drive, Ste. 350, Minnetonka, MN 55343
Good Time Golf Media Group LLC	P.O. Box 11037, Boulder, CO 80301
Great Chefs Television GCI Inc.	P.O. Box 56757, New Orleans, LA 70156-6756
Green Power Media	4320 Via Marina, #A, Marina del Rey, CA 90292
Hollywood Close Ups, Inc.	4120 St. Clair Avenue, Studio City, CA 91604
Independent Communications Associates, Inc.	38 Miller Avenue, Mill Valley, CA 94941
Jack Van Impe Ministries	1718 Northfield Drive, Rochester Hills, MI 48309
JMJ Films Inc.	11 West 84 <sup>th</sup> Street, #4, New York, NY 10024-4761
Mainframe Entertainment	2025 West Broadway, Suite 200, Vancouver, BC, Canada, V6J 1Z6
Mansfield Television Distribution Co.	13924 Panay Way, P-604, Marina del Rey, CA 90292
Mabinogion Films	POB 92, Spencertown, NY 12165
Mark Anthony Productions	1375 Broadway, 21st Floor, New York, NY 10018
M. Entertainment	10662 Chanel Lane, Stockton, CA 95212
Money.net.TV Inc.	251 Jeanell Drive, #3, Carson City, NV 89703
Nelson Davis Television Productions	2809 2nd Street, Suite 2, Santa Monica, CA 90405
New Dimension Media	680 N. Lake Shore Drive, Suite 900, Chicago, Illinois 60611
Nightengale Associates, Inc.	407 Philadelphia Pike, Wilmington, DE 19809
PRO	1800 North Highland Ave., Suite 472, Los Angeles, CA 90028
Professional Bull Riders, Inc. (PBR, Inc.)	6 South Tejon Street, Suite 700, Colorado Springs, CO 80903
Southside Christian Palace Community	11243 So. Vermont Avenue, Los Angeles, CA 90044
SWN Productions, LLC	333 Beichl Avenue, PO Box 683, Beaver Dam, WI 53916-0683
TCL Inc.	7165 SW Raleighwood Lane, Portland, OR 97225
TCT Ministries, INC	111 Airway Drive, Marion, IL 62959
The Smiley Group, Inc.	3870 Crenshaw Blvd., Suite 391, Los Angeles, CA 90008
The Television Corporation plc	30 Sackville Street, London W1S 3DY UK
Thinkfilm Inc.	2300 Yonge Street, Suite 906, Toronto Ontario M4P 1E4
Timberwolf Productions, Inc.	8051 St. Hwy. 34, Marble Hill MO 63764
United Television LLC	3890 Indian Ripple Road, Beavercreek, OH 45440
Whidbey Island Films, Inc.	3724 Vantage Avenue, Studio City, CA 91604
Willie Wilson Productions	4801 Southwick Drive, Suite 601, Matteson, IL 60443



# **Exhibit 9**

# Phil Slater Associates

April 11, 2003

Via Certified Mail  
Marian Oshita  
Worldwide Subsidy Group d/b/a Independent Producers Group  
9903 Santa Monica Blvd., # 655  
Beverly Hills, California 90212

Dear Ms. Oshita:


The purpose of this letter is to terminate the Mandate Agreement dated July 7, 2001 ("Agreement"), by and between Phil Slater Associates and Independent Producers Group effective immediately. Neither Worldwide Subsidy Group d/b/a Independent Producers Group, nor any other agents, affiliates, or assignees of your organization(s) are authorized to claim to represent, to represent, or to file any more documentation for pending or future claims for my company in any domestic or international matters. If you have filed a notice of intent to participate in the year 2000 cable proceeding you are instructed to assign that claim that claim to Hammerman, PLLC. You will be compensated fully for any claims in which you have rendered services under the terms of our agreement up through television programming years 2000 for cable and satellite retransmission royalty claims filed at the United States Copyright Office, and any international claims you may have filed without my authorization. In accordance with that Agreement, my company only authorized Independent Producers Group to file claims for television programming year 2000.

Please provide me with a detailed status report, copies of, and an accounting for all claims filed on behalf of Phil Slater Associates domestically and internationally by April 30, 2002. That information and all further communications should be directed to our attorney:

Edward S. Hammerman, Esq.  
Intermediary Copyright Royalty Services  
a division of Hammerman, PLLC  
5335 Wisconsin Avenue, N.W., Suite 440  
Washington, D.C. 20015-2052

Finally, I would appreciate it if you would notify all copyright collectives with whom you have filed royalty claims that you no longer represent my organization. Thank you.

Sincerely,

  
Philip D. Slater

# **Exhibit 10**

**Pick & Boydston, LLP**  
732 West 9<sup>th</sup> Street, Suite 103  
San Pedro, CA 90731  
**Telephone (310)987-2414**

February 18, 2022

E-Mail: Matthew.MacLean@PillsburyLaw.com  
E-Mail: arnie@lutzker.com

**SETTLING DEVOTIONAL CLAIMANTS**

Matthew J. MacLean  
Michael Warley  
PILLSBURY WINTHROP SHAW PITTMAN LLP  
P.O. Box 57197  
Washington, D.C. 20036-9997

Arnold P. Lutzker  
Benjamin Sternberg  
LUTZKER & LUTZKER LLP  
1233 20<sup>th</sup> Street, NW, Suite 703  
Washington, DC 20036

**Re: *Docket Nos. 16-CRB-0009-CD (2014-2017), 16-CRB-0010-SD (2014-2017);  
Distribution of the 2014-2017 Cable and Satellite Royalty Funds; Multigroup  
Claimants' Document Discovery Requests on Claims Issues***

Dear Sir/Madam:

On behalf of Multigroup Claimants ("MC"), the following are the responses to the discovery requests and follow-up discovery requests propounded by the Settling Devotional Claimants, dated January 28, 2022.

**General Objections**

MC will respond to the requests to the best of its ability; however, with respect to each of the requests, MC states the following General Objections:

- 1) MC objects to these requests to the extent that they are vague, ambiguous, or otherwise not susceptible to a response, and to the extent that they are overly broad, unduly burdensome, and seek the disclosure of documents and information not reasonably calculated to lead to the discovery of evidence admissible in this proceeding.
- 2) MC objects to these requests to the extent they call for the disclosure of information that is confidential to MC and/or third parties. Any information identified as "confidential"

shall be subject to a General Protective Order proposed to the Copyright Royalty Judges for this proceeding.

- 3) MC objects to these requests to the extent that they seek disclosure of documents and information that is not subject to discovery pursuant to the regulations applicable to the Copyright Royalty Board, set forth at 37 C.F.R. Section 301.1, et seq.
- 4) MC objects to these requests to the extent that the definitions and instructions purport to impose obligations beyond those imposed by the regulations of the Copyright Royalty Board.
- 5) MC objects to these requests to the extent that they seek the disclosure of information and documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine.
- 6) MC objects to these requests to the extent that they seek the disclosure of information and documents not within MC's possession, custody, or control.
- 7) MC objects to these requests to the extent that they seek the disclosure of information unrelated to these proceedings.
- 8) MC objects to these requests to the extent that they seek information in a form or format not regularly kept in the normal course of business.
- 9) MC objects to these requests to the extent that they request the preparation of documents that do not exist.
- 10) MC objects to these requests to the extent that they call for either responses or the production of documents in a format beyond what is required by the Copyright Royalty Board regulations, or in a format with which the responding party did not cooperate with MC, e.g., repeating each of the requests.
- 11) MC simultaneously served document requests on the propounding party herein. MC objects to these requests to the extent that they seek documents similarly requested by MC but to which the propounding party objects and will refuse to produce documents. Absent an order of the Copyright Royalty Board requiring reciprocal disclosure and production, MC will not produce such documents.
- 12) According to the January 10, 2022 order of the Judges, "Disclosures must not include duplicate claims or claims for a single program in more than one category." In many cases, complying with such order will deny a claimant comprehensive royalties for their program, if such program qualifies for placement in multiple categories according to the category definitions adopted by the Judges in their order of April 5, 2021. For example, non-U.S. producer programming qualifies for placement in the Canadian Claimants category to the extent that qualifying compensable broadcasts originate in Canada, while also qualifying in the Program Suppliers category to the extent that qualifying broadcasts originate in the U.S. Consequently, the nationality of the claimant, coupled with the origination of qualifying broadcast, dictate whether only one or multiple categories apply

to program compensation in such situation. While not currently relevant, placement in both the non-commercial programming category and Program Suppliers category similarly occurs. MC has endeavored to clarify when this circumstance occurs, and interprets the Judges' order to prohibit placement of a program in multiple categories based on its content only (e.g., sports vs. entertainment vs. devotional).

### **Specific Objections**

1. Provide all information required by the CRB's January 10, 2022 Order, including "1) [Your] authority to represent each claimant, 2) program information for each claimant (e.g., correct title information for each claimed program and other identifying information in cases in which titles may be confused), and 3) a clear statement, by royalty year, of each claim against the royalty fund and the claimant categories in which the asserted claim belongs. Disclosures must not include duplicate claims or claims for a single program in more than one category."
2. Produce all documents relating to the information sought in Request No. 1 and the CRB's January 10, 2022 Order.

**Response to Request No. 2:** MC objects to the request on the grounds that such request for information is ambiguous and overbroad to the extent that it seeks documents above and beyond the documents identified in the CRB's January 10, 2022 Order.

3. For every MC Devotional Claimant, identify every program title for each program in Your Claims in these Proceedings, as well as other identifying information in cases in which titles may be confused, stating the applicable years (2014 through 2017) and proceedings (cable or satellite) for each, and produce documents sufficient to identify the same.
4. Identify every program or program title in Your Claims on behalf of an MC Devotional Claimant, that is also claimed by any other Claimant in these Proceedings.
5. Identify every MC Devotional Claimant, stating the applicable years (2014 through 2017) and proceedings (cable or satellite) for each, and produce documents sufficient to identify every MC Devotional Claimant and the years and proceedings in which You assert Claims on their behalf.

**Response to Request No. 5:** MC objects to the request on the grounds that such request is redundant of Request no. 1.

6. Produce documents sufficient to identify the ultimate recipient of any royalties You collect in these proceedings for every MC Devotional Claimant.

**Response to Request No. 6:** MC objects to the request on the grounds that such request is redundant of Request no. 1.

7. For every MC Devotional Claimant, identify every program claimed in the Devotional Category in these Proceedings, stating the applicable years (2014 through 2017) and

proceedings (cable or satellite) for each, and produce documents sufficient to identify every program in Your Claims in these Proceedings for each year, proceeding, and MC Devotional Claimant.

**Response to Request No. 7:** MC objects to the request on the grounds that such request is redundant of Request no. 1.

8. If any MC Devotional Claimant claims the same program as any other Claimant (including any other MC Devotional Claimant), provide all documents relating to any communications or written agreements between or among those Claimants and/or You relating to the Authority to file Claims for those programs or program titles.

**Response to Request No. 8:** MC objects to the request on the grounds that such request is redundant of Request no. 1. MC further objects to the request on the grounds that the request is overbroad to the extent that the request seeks "any communications" between a particular claimant and MC.

9. Produce documents sufficient to show the stations which carried every program You claim in the Devotional Category in each year of these Proceedings.

**Response to Request No. 9:** MC objects to the request on the grounds that such request is irrelevant as beyond the scope of the discovery required by the January 10, 2022 order relating to "claims issues".

10. Produce documents sufficient to show the stations which carried programs in Your Claims on behalf of Salem Baptist Church of Chicago, Inc. that You claim in the Devotional Category in each year of these Proceedings.

**Response to Request No. 10:** MC objects to the request on the grounds that such request is irrelevant as beyond the scope of the discovery required by the January 10, 2022 order relating to "claims issues".

11. For every program claimed by any MC Devotional Claimant in the Devotional Category that is also claimed by any other Claimant in any other Category (or has the same name as such a program), produce documents sufficient to identify the program broadcasts in Your Claims in the Devotional Category.

**Response to Request No. 11:** MC objects to the request on the grounds that such request is redundant of Request no. 1.

12. For each MC Devotional Claimant, produce all documents relating to or underlying the categorization or potential categorization of any programs in Your Claims for these Proceedings in the Devotional Category as devotional programs, for any programs that the CRB has not previously determined was properly categorized in the Devotional Category in a final determination in a prior CRB proceeding.

13. Produce all documents that undermine the categorization as Devotional of any programs in Your Claims that You seek in the Devotional Category.
14. If You or any MC Devotional Claimant claims any program in both the Devotional Category and any other category, identify such program, and produce all documents underlying or relating to the basis for claiming the program in the Devotional Category claim and for claiming the program in the other category.
15. For MC Devotional Claimants with programs claimed in both the Devotional and Program Suppliers categories (including at least the following: IWV Media Group, Inc.; K2 Media Group; Promark Television, Inc.; and Worldwide Subsidy Group LLC), produce documents sufficient to show the ultimate producers, distributors, and copyright owners of any programs claimed in the Devotional Category.

**Response to Request No. 15:** MC objects to the request on the grounds that such request is redundant of Request no. 1. MC objects to the request on the grounds that the "presumption of validity" afforded to claimants includes the claimant's claim of ownership or entitlement to make claim for the program, and such claimant's categorization of their program. Notwithstanding the foregoing, MC has no documents in its possession or of which it is aware that contradict the claimant's claim of ownership or entitlement to make claim, or the claimant's categorization of their program in any particular category.

16. For MC Devotional Claimants with programs claimed in both the Devotional and Program Suppliers categories (including at least the following: IWV Media Group, Inc.; K2 Media Group; Promark Television, Inc.; and Worldwide Subsidy Group LLC), produce documents sufficient to show the programs claimed in the Devotional Category are devotional programs.

**Response to Request No. 16:** MC objects to the request on the grounds that such request is redundant of Request no. 1. MC objects to the request on the grounds that the "presumption of validity" afforded to claimants includes the claimant's claim of ownership or entitlement to make claim for the program, and such claimant's categorization of their program. Notwithstanding the foregoing, MC has no documents in its possession or of which it is aware that contradict the claimant's claim of ownership or entitlement to make claim, or the claimant's categorization of their program in any particular category.

17. For MC Devotional Claimants with programs in both the Devotional and Program Suppliers categories (including at least the following: IWV Media Group, Inc.; K2 Media Group; Promark Television, Inc.; and Worldwide Subsidy Group LLC), produce all documents relating to Your Authority to file Claims for the programs in Your Claims in the Devotional Category, including all documents and communications with any entity relating to the Your Authority to file Claims in these Proceedings for these programs or Claimants.



**Response to Request No. 17:** MC objects to the request on the grounds that such request is, in part, redundant of Request no. 1. To the extent that the request seeks “all” communications with a represented claimant, the request is overbroad.

18. Produce all documents relating to Your Authority to file Claims for every MC Devotional Claimant.

**Response to Request No. 18:** MC objects to the request on the grounds that such request is redundant of Request no. 1.

19. Produce all documents that may tend to undermine the basis for Your Authority to file Claims on behalf of any MC Devotional Claimant.
20. Produce all communications with any MC Devotional Claimant relating to these Proceedings or the Claims filed in the Proceedings on their behalf.

**Response to Request No. 20:** MC objects to the request on the grounds that such request for information is ambiguous and overbroad. To the extent that the request seeks “all” communications with a represented claimant relating to these proceedings, the request is overbroad.

21. Produce every agreement between every MC Devotional Claimant and WSG, and all documents relating to or underlying Your claim that “all of the represented copyright claimants have been represented vis-a-vis agreements entered into with WSG.” MC Replies in Support of Motions for Partial Distribution, filed Aug. 13, 2021.

**Response to Request No. 21:** MC objects to the request on the grounds that such request is redundant of Request no. 1.

22. Produce all agreements between every MC Devotional Claimants and You and any of Your affiliates, principals, shareholders, agents, alter-egos, predecessors, or owners, including Ryan Galaz, Alfred Galaz, Raul Galaz, Ruth Galaz, and Denise Vernon, Spanish Language Producers, IPG, and/or WSG, including all communications and documents relating to the terms, duration, and possible changes to such agreements.

**Response to Request No. 22:** MC objects to the request on the grounds that such request, in part, is redundant of Request no. 1. MC objects to the request on the grounds that such request is, in part, beyond the scope of the discovery required by the January 10, 2022 order relating to “claims issues”, to the extent that it seeks agreements with persons that are neither claimants nor participants in these proceedings, nor predecessors in interest, including Ryan Galaz, Alfred Galaz, Raul Galaz, Ruth Galaz, or Denise Vernon.

23. Produce all documents relating to any dispute, disagreement, misunderstanding, or confusion relating to Your Authority to file Claims, including communications and agreements with any MC Devotional Claimant relating to Claims in any year.

**Response to Request No. 23:** MC objects to the request on the grounds that such request for information is ambiguous and overbroad.

24. Produce all documents and communications relating to any assignment, transfer, sale, revocation, suspensions, expiration, limitation, condition, modification, termination, attempted termination, rescission, disavowal, or other change relating to the Authority to file Claims for any MC Devotional Claimant, whether such change was relating to Your Authority to file Claims or to the Authority to file Claims of any other entity whatsoever.

**Response to Request No. 24:** MC objects to the request on the grounds that such request is redundant of Request no. 19. MC objects to the request, in part, on the grounds that such request for information is ambiguous and overbroad, to the extent that it seeks information relating to “any other entity whatsoever”, including but not limited to parties that either are not making claim for programming in the devotional programming category, or not making claim in these proceedings.

25. Produce all documents and communications relating to any assignment, transfer, sale, revocation, suspensions, limitation, condition, modification, termination, attempted termination, rescission, disavowal, or other change relating to Your Authority to file Claims on behalf of any MC Devotional Claimant in prior or future royalty years, even if even if You contend that such action or change was invalid, does not apply to these Proceedings, or was rescinded, revoked, or overridden by subsequent actions or events (and produce all documents relating to any such subsequent actions or events).

**Response to Request No. 25:** MC objects to the request on the grounds that such request is redundant of Request nos. 1, 19, and 24.

26. Identify the date on which Your Authority to file Claims for every MC Devotional Claimant was acquired or the intention for You to file Claims by the Claimant was expressed prior to filing Claims in these Proceedings, and produce all documents reflecting or relating to the date when Your Authority to file Claims for every MC Devotional Claimant was acquired or affirmed by the Claimant.

**Response to Request No. 26:** MC objects to the request on the grounds that such request is, in part, redundant of Request no 1. MC objects to the request on the grounds that such request is, in part, overbroad, to the extent that it requests “all documents reflecting or relating to . . . .”

27. Produce all documents relating to Your Authority to file Claims in these Proceedings, or lack thereof, for 2014 royalties on behalf of any MC Devotional Claimant.

**Response to Request No. 27:** MC objects to the request on the grounds that such request is irrelevant, as MC has made no claim relating to 2014 royalties. MC objects to the request on the grounds that such request is overbroad, to the extent that it requests “all documents . . . .”

28. Produce all documents relating to the “time the agreement was executed” (as that phrase is used in Exhibit A to MC’s Petition to Participate in 2014-17 Cable Proceedings) for

MC to represent each MC Devotional Claimants, including all documents and communications arising after the “time the agreement was executed” relating to your Authority to file Claims on behalf of an MC Devotional Claimant.

**Response to Request No. 28:** MC objects to the request on the grounds that such request is redundant of Request nos. 1, 19, and 24. MC objects to the request, in part, on the grounds that such request for information is overbroad, to the extent that it seeks information relating to “all documents and communications arising after . . . .”

29. Produce all documents relating to any partial assignment of rights or Authority to file Claims to MC for less than the entire 2014-2017 period covered by these Proceedings, including all documents underlying or relating to the statement in MC’s Petitions to Participate in these Proceedings that “certain of the parties assigned rights to MC, or made independent claims, for less than the aggregate of 2015-2017 calendar years.”

**Response to Request No. 29:** MC objects to the request on the grounds that such request is redundant of Request no 1.

30. Produce all communications with any MC Devotional Claimant relating to Claims in these Proceedings for the year 2014.

**Response to Request No. 30:** MC objects to the request on the grounds that such request is irrelevant, as MC has made no claim relating to 2014 royalties. MC objects to the request on the grounds that such request is overbroad, to the extent that it requests “all communications . . . .”

31. Produce all communications with any MC Devotional Claimant discussing the lack of Claims filed by You for that Claimant’s programming in these Proceedings for the 2014 royalty year.

**Response to Request No. 31:** MC objects to the request on the grounds that such request is irrelevant, as MC has made no claim relating to 2014 royalties. MC objects to the request on the grounds that such request is overbroad, to the extent that it requests “all communications . . . .”

32. Produce all agreements or documents relating to any indemnity, rights or obligations between You and any MC Devotional Claimant relating to copyright royalties for the year 2014.

**Response to Request No. 32:** MC objects to the request on the grounds that such request is irrelevant, as MC has made no claim relating to 2014 royalties. MC objects to the request on the grounds that such request is overbroad, to the extent that it requests “all agreements or documents . . . .”

33. Produce all documents relating to every MC Devotional Claimant’s grant to any person or entity whatsoever of Authority to file Claims for the years at issue in these Proceedings.

**Response to Request No. 33:** MC objects to the request on the grounds that such request is redundant of Request nos. 1, 19, and 24.

34. Produce all documents relating to any Claims on behalf of any MC Devotional Claimant that were filed or asserted by any entity other than MC, including any “independent claims” made by or on behalf of any MC Devotional Claimant for any year in these Proceedings.
35. Produce all cable and satellite royalty claims filed by any person or entity other than MC on behalf of any MC Devotional Claimant in these Proceedings.
36. Produce all documents and communications relating to the claims filed by All Global Media, LLC on behalf of Jack Van Impe Ministries in these Proceedings.
37. Produce all agreements and communications between and among You and All Global Media, LLC relating to filing Claims in these Proceedings.
38. Produce all documents relating to All Global Media, LLC’s Authority to file Claims on behalf of Jack Van Impe Ministries.
39. Produce all documents relating to Your legal structure, ownership and control.
40. Produce documents sufficient to identify all of Your owners, officers, principals, shareholders, and agents for the purposes of pursuing Claims in these Proceedings.
41. Produce documents sufficient to identify all of Your past and current assumed names, fictitious names, owners, principals, shareholders, agents, assignees, predecessors-in-interest, successors-in-interest, parents, subsidiaries, and affiliates, including, but not limited to, WSG, IPG, Spanish Language Producers, Ryan Galaz, Alfred Galaz, Raul Galaz, Ruth Galaz, and Denise Vernon, or any other applicable fictitious names, alteregos, pseudonyms, monikers, or trade names.

**Response to Request No. 41:** MC objects to the request, in part, on the grounds that such request is irrelevant, to the extent that it requests documents regarding “past . . . assumed names . . .” MC objects to the request to the extent that such documents are already in the possession of the SDC, or a matter of public record.

42. Produce all agreements, as well as all communications and documents relating to the terms, duration, and possible changes to such agreements, between MC and any of its affiliates, principals, shareholders, agents, alter-egos, predecessors, or owners, including Ryan Galaz, Raul Galaz, Alfred Galaz, Ruth Galaz, Denise Vernon, Spanish Language Producers, IPG, and/or WSG.

**Response to Request No. 42:** MC objects to the request on the grounds that such request is irrelevant as beyond the scope of the discovery required by the January 10, 2022 order relating to “claims issues”. MC further objects to the request on the grounds that such request is irrelevant to the extent that it seeks agreements with persons that are

neither claimants nor participants in these proceedings, nor predecessors in interest, including Ryan Galaz, Alfred Galaz, Raul Galaz, Ruth Galaz, or Denise Vernon.

43. If any documents produced in these Proceedings were created or signed on a date that is not apparent on the face of the document or that is different from the effective date reflected in the document, identify the date any such documents were actually created and/or signed, and produce all documents and communications reflecting or relating to the creation and transmission of such documents.
44. Produce all documents and information produced and all responses provided to any other participant in these Proceedings.

Subject to said objections, after making a diligent search of documents in its possession, MC produces herewith all documents responsive to these requests, pursuant to and protected by the terms of the Protective Order in place in this proceeding. Production shall be delivered via a Google Drive file emailed directly from MC.

Sincerely,

/s/

Brian Boydston, Esq.

Counsel for Multigroup Claimants

# **Exhibit 11**

# **RESTRICTED**

# **Exhibit 12**

# **RESTRICTED**

# **Exhibit 13**



**Before the  
COPYRIGHT ROYALTY JUDGES  
The Library of Congress**

<i>In re</i>	
<b>DISTRIBUTION OF CABLE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0009-CD (2014-2017)</b>
<b>DISTRIBUTION OF SATELLITE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0010-SD (2014-2017)</b>

**DECLARATION OF EVA-MARIE NYE**

I, Eva-Marie Nye, hereby state and declare as follows:

1. I am the Senior Director of Research Services for the law firm Pillsbury Winthrop Shaw Pittman LLP.
2. As the request of counsel for the Settling Devotional Claimants, I conducted a search for corporate records in the Texas Secretary of State's SOS Direct database for the entity IWV Media Group, Inc. ("IWV") on April 13, 2022.
3. My search revealed that IWV's corporate charter was subject to a tax forfeiture on July 24, 2009.
4. There were no subsequent filings in the Texas Secretary of State's records with respect to IWV, meaning that its charter remains forfeit and its corporate status has not been reinstated in the years since 2009.
5. Exhibit 14 to the Motion to Disallow Multigroup Claimants' Claims is a true and correct copy of the certificate of forfeiture pursuant to the Texas Tax Code that I obtained from the Texas Secretary of State's records.
6. Exhibit 15 to the Motion to Disallow Multigroup Claimants' Claims is a true and correct

copy of the results of my search in the Texas Secretary of State's database, which contains a complete listing of the filing history of records associated with IWV. This record indicates that IWV's status is "forfeited existence" and that the last activity associated with IWV was the tax forfeiture on July 24, 2009.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC on: May 4, 2022

Eva Marie Nye  
Eva-Marie Nye

# **Exhibit 14**



**Forfeiture pursuant to Section 171.309 of the Texas Tax Code  
of  
IWV MEDIA GROUP, INC.**

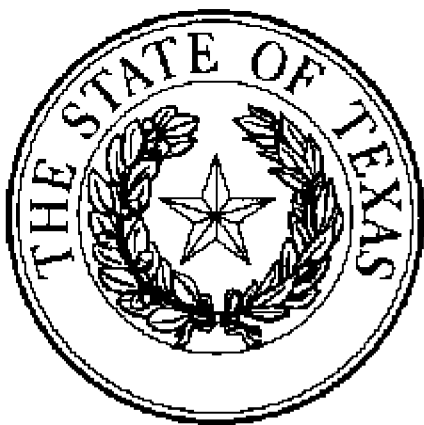
File Number : 154026400

Certificate / Charter forfeited : July 24, 2009

The Secretary of State finds that:

1. The Secretary has received certification from the Comptroller of Public Accounts under Section 171.302 of the Texas Tax Code indicating that there are grounds for the forfeiture of the taxable entity's charter, certificate or registration; and
2. The Comptroller of Public Accounts has determined that the taxable entity has not revived its forfeited privileges within 120 days after the date that the privileges were forfeited.

Therefore, pursuant to Section 171.309 of the Texas Tax Code, the Secretary of State hereby forfeits the charter, certificate or registration of the taxable entity as of the date noted above and records this notice of forfeiture in the permanent files and records of the entity.



A handwritten signature in cursive script, appearing to read "Hope Andrade".

Hope Andrade  
Secretary of State

# **Exhibit 15**












**TEXAS SECRETARY of STATE**  
**JOHN B. SCOTT**

**BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY**

**Filing Number:** 154026400  
**Original Date of Filing:** June 23, 1999  
**Formation Date:** N/A  
**Tax ID:** 17606104291  
**Duration:** Perpetual

**Entity Type:** Domestic For-Profit Corporation  
**Entity Status:** Forfeited existence  
**FEIN:**

**Name:** IWV MEDIA GROUP, INC.  
**Address:** 912 E HOUSTON ST  
HIGHLANDS, TX 775622826 USA

<a href="#">REGISTERED AGENT</a>		<a href="#">FILING HISTORY</a>	<a href="#">NAMES</a>	<a href="#">MANAGEMENT</a>	<a href="#">ASSUMED NAMES</a>	<a href="#">ASSOCIATED ENTITIES</a>	<a href="#">INITIAL ADDRESS</a>
View Image	Document Number	Filing Type	Filing Date	Effective Date	Eff. Cond	Page Count	
	6978190	Articles Of Incorporation	June 23, 1999	June 23, 1999	No	2	
	28040260001	Public Information Report (PIR)	December 31, 2002	February 27, 2003	No	1	
	53891399771	Tax Forfeiture	February 13, 2004	February 13, 2004	No	1	
	68370400002	Reinstatement	August 25, 2004	August 25, 2004	No	2	
	82525830001	Public Information Report (PIR)	December 31, 2004	February 12, 2005	No	1	
	117324680361	Tax Forfeiture	February 10, 2006	February 10, 2006	No	1	
	196586810002	Reinstatement	December 14, 2007	December 14, 2007	No	2	
	208684970001	Public Information Report (PIR)	December 31, 2007	March 16, 2008	No	1	
	209848580002	Change of Registered Agent/Office	March 26, 2008	March 26, 2008	No	N/A	
	275349050001	Public Information Report (PIR)	December 31, 2008	September 18, 2009	No	1	
	268930311524	Tax Forfeiture	July 24, 2009	July 24, 2009	No	1	

Instructions:

-  To place an order for additional information about a filing press the 'Order' button.

# **Exhibit 16**

# **RESTRICTED**

# **Exhibit 17**

# **RESTRICTED**



# **Exhibit 18**

**Before the  
COPYRIGHT ROYALTY JUDGES  
The Library of Congress**

<i>In re</i>	
<b>DISTRIBUTION OF CABLE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0009-CD (2014-2017)</b>
<b>DISTRIBUTION OF SATELLITE ROYALTY FUNDS</b>	<b>Docket No. 16-CRB-0010-SD (2014-2017)</b>

**DECLARATION OF MICHAEL WARLEY**

I, Michael Warley, hereby state and declare as follows:

1. I am counsel to the Settling Devotional Claimants (“SDC”) in these proceedings. I submit this declaration to authenticate certain exhibits filed in support of the SDC’s Motion to Disallow Multigroup Claimants’ Claims in these proceedings and identify the basis for any documents filed as restricted subject to the protective order.
2. Many of the documents filed in support of the Motion were previously filed or produced by Multigroup Claimants (“MGC”) or its predecessors/aliases, Worldwide Subsidy Group, LLC (“WSG”) or Independent Producers Group (“IPG”).
3. Exhibit 1 is a true and correct copy of a document previously filed publicly with the Judges by MGC, entitled “Authorization and Transfer” and bearing a date of January 20, 2015. *See* Multigroup Claimants’ Response to Order to Show Cause, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13) (Feb. 28, 2020). A copy of this document was also produced by MGC in discovery in these proceedings.
4. Exhibit 2 is a true and correct copy of a document previously filed publicly with the Judges by MGC, containing records of Alfred Galaz’s use of the assumed name “Multigroup

Claimants”, dated January 20, 2015. *See* Multigroup Claimants’ Response to Order to Show Cause, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13) (Feb. 28, 2020). A copy of this document was also produced by MGC in discovery in these proceedings.

5. Exhibit 3 is a true and correct copy of a document previously filed with the Judges by MGC, and later de-designated as confidential by the Judges because its contents were publicly available. *See* Order Granting SDC Motion to De-Designate and Denying WSG Motion for Sanctions, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13) (June 12, 2020). Exhibit 3 is a copy of a document entitled “Transfer of Ownership Interests in Worldwide Subsidy Group, LLC dba Independent Producers Group,” bearing a date of December 31, 2017. A copy of this document was also produced by MGC in discovery in these proceedings.

6. Exhibit 4 is a true and correct copy of a document previously filed with the Judges by MGC, and later de-designated as confidential by the Judges because its contents were publicly available. *See* Order Granting SDC Motion to De-Designate and Denying WSG Motion for Sanctions, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13) (June 12, 2020). Exhibit 4 is a copy of a document entitled “Transfer of Ownership Interests in Multigroup Claimants and Spanish Language Producers,” bearing a date of January 1, 2018. A copy of this document was also produced by MGC in discovery in these proceedings.

7. Exhibit 5 is a true and correct copy of a document previously filed publicly with the Judges by MGC, entitled “Transfer of Interests to Worldwide Subsidy Group LLC” and bearing a date of October 14, 2020. *See* Motion for Substitution of Parties by Worldwide Subsidy Group LLC or, Alternatively, Ryan Galaz, Consol. Dkt. 14-CRB-0010-CD/SD (2010-13) (Oct. 14, 2020). A copy of this document was also produced by MGC in discovery in these proceedings.

8. Exhibit 6 is a true and correct copy of a document produced by MGC in discovery in these proceedings, a record of WSG's use of the assumed name "Multigroup Claimants", dated January 6, 2020.
9. Exhibit 8 is a compilation of true and correct copies of claims filed by All Global Media, LLC in these proceedings for the years 2014-17. For satellite claims in 2014, a copy of the claimants list posted by the Judges in the 2014 SD (legacy claims) docket on eCRB is included in lieu of copies of the original claims filed in that docket, which are not currently available publicly.
10. Exhibit 9 is a true and correct copy of a document previously filed publicly in copyright royalty proceedings by Phil Slater Associates, a letter from Phil Slater Associates to WSG terminating an agreement with WSG, dated April 11, 2003. *See* Joint Notice of Intent to Participate and Comments on the Existence of Controversies, Dkt. No. 2003-02 CARP CD 2001 (Sept. 12, 2003).
11. Exhibit 10 is a true and correct copy of MGC's response to the SDC's claims discovery requests in these proceedings, dated February 18, 2022.
12. Exhibit 11 is a true and correct copy of a document produced by MGC in discovery in these proceedings, an agreement between Salem Baptist Church of Chicago, Inc. and WSG carrying a date of July 31, 2002. This document was marked "Restricted" under the protective order in these proceedings when produced by MGC. While MGC did not state the basis for the designation at the time of production in an accompanying affidavit or declaration, the SDC are nevertheless filing it under seal pursuant to the terms of that order, and quoted portions of its contents will be redacted in the public version of the Motion. Other than Exhibit 11, MGC did not produce any contracts or agreements with Salem Baptist Church of Chicago, Inc.

13. Exhibit 12 is a true and correct copy of a document produced by MGC in discovery in these proceedings, a declaration on behalf of Salem Baptist Church of Chicago, Inc. by Veronica Abney and dated November 22, 2014, and attaching an Acknowledgement of Representation on behalf of Salem Baptist Church of Chicago, Inc. bearing Ms. Abney's signature dated April 16, 2014. This document was marked "Restricted" under the protective order in these proceedings when produced by MGC. While MGC did not state the basis for the designation at the time of production in an accompanying affidavit or declaration, the SDC are nevertheless filing it under seal pursuant to the terms of that order, and quoted portions of its contents will be redacted in the public version of the Motion.

14. Exhibit 16 is a true and correct copy of a document produced by MGC in discovery in these proceedings, an agreement between Jack Van Impe Ministries International and WSG carrying a date of July 25, 2002. This document was marked "Restricted" under the protective order in these proceedings when produced by MGC. While MGC did not state the basis for the designation at the time of production in an accompanying affidavit or declaration, the SDC are nevertheless filing it under seal pursuant to the terms of that order, and quoted portions of its contents will be redacted in the public version of the Motion.


15. Exhibit 17 is a true and correct copy of a document produced by MGC in discovery in these proceedings, a letter of extension between Jack Van Impe Ministries International and WSG carrying a date of July 25, 2002. This document was marked "Restricted" under the protective order in these proceedings when produced by MGC. While MGC did not state the basis for the designation at the time of production in an accompanying affidavit or declaration, the SDC are nevertheless filing it under seal pursuant to the terms of that order, and quoted portions of its contents will be redacted in the public version of the Motion.

16. I have reviewed the documents produced in discovery by MGC in these proceedings in response to discovery requests from the SDC. In that production, not a single document specifically identified a year in which WSG was engaged after 2013. No documents produced indicated that authority was acquired or retained by MGC after claims were not filed in July 2015 for royalty year 2014. Aside from two documents from Eagle Mountain International Church that bear dates in 2016 and refer to the ownership of its programming and its engagement of WSG in the 2010-13 royalty proceedings, MGC did not produce documents or communications of any kind from its devotional claimants dated after the year 2014. Not a single document (including those from Eagle Mountain) applied to or even acknowledged royalty claims after the year 2013.

17. MGC did produce documents that purported to transfer WSG's authority to represent claimants in copyright royalty proceedings to various different entities, including transfers to MGC and to Ryan Galaz. MGC did not produce any documents or communications with any claimants regarding such transfers or indicating that any claimants consented to such transfers.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC on: May 4, 2022

  
\_\_\_\_\_  
Michael Warley

# **Exhibit 19**

**Before the  
COPYRIGHT ROYALTY JUDGES  
The Library of Congress**

*In re*

**DISTRIBUTION OF CABLE  
ROYALTY FUNDS**

**Docket No. 16-CRB-0009-CD (2014-2017)**

**DISTRIBUTION OF SATELLITE  
ROYALTY FUNDS**

**Docket No. 16-CRB-0010-SD (2014-2017)**


**DECLARATION OF ARNOLD LUTZKER**

I, Arnold Lutzker, hereby state and declare as follows:

1. I am counsel to the Settling Devotional Claimants (“SDC”) in these proceedings.
2. I received a copy of Exhibit 7 to the SDC’s Motion to Disallow Multigroup Claimants’ Claims from Marian Oshita, a representative of All Global Media, LLC (“AGM”).
3. Exhibit 7 is a true and correct copy of the Secondary Rights Agreement between AGM and Jack Van Impe Ministries International provided to me by Ms. Oshita.
4. Ms. Oshita confirmed that Exhibit 7 is an authentic copy of AGM’s agreement with Jack Van Impe Ministries International via email on April 29, 2022. A true and correct copy of Ms. Oshita’s confirmatory email is attached to this declaration as Exhibit A.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed in Washington, DC on: May 4, 2022

  
\_\_\_\_\_  
Arnold Lutzker



# **Exhibit A**

**From:** [oshitama@yahoo.com](mailto:oshitama@yahoo.com)  
**Date:** April 29, 2022 at 1:31:45 AM EDT  
**To:** Arnie Lutzker <[arnie@lutzker.com](mailto:arnie@lutzker.com)>  
**Subject:** Re: Confirmation

Yes, we appreciate and welcome your assistance.

Thank you.

On Thursday, April 28, 2022, 02:34:09 PM PDT, Arnie Lutzker <[arnie@lutzker.com](mailto:arnie@lutzker.com)> wrote:

Marian – As I indicated we will be filing a motion regarding the claims of MGC next week, and with your permission we will reference the Jack Van Impe Agreement with AGM and file a copy (attached) to establish that AGM was given authority to represent the ministry in 2006. In case any question arises, I'll just ask you to confirm my understanding that we have authority to reference and file the agreement and that you advise it is authentic.

Please confirm by return email that these understandings are correct.

Arnie

Arnold P. Lutzker

Lutzker & Lutzker LLP

1233 20th Street, NW

Suite 703

Washington, DC 20036

Telephone: [202-408-7600](tel:202-408-7600) ext. 1

Cell: [202-321-9156](tel:202-321-9156)

Fax: [202-408-7677](tel:202-408-7677)

Email: [arnie@lutzker.com](mailto:arnie@lutzker.com)<<mailto:arnie@lutzker.com>>

Website: [<http://www.lutzker.com><<http://www.lutzker.com>]/[www.lutzker.com](http://www.lutzker.com)<<http://www.lutzker.com>/>

Be sure to check out our new firm website - <https://www.lutzker.com>

To ensure compliance with requirements imposed by the IRS, we inform you that any tax advice contained in this communication (including any attachments) was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding tax-related penalties under the Internal Revenue Code or (2) promoting, marketing, or recommending to another party any tax-related matter addressed herein. The information contained in this email message is privileged and confidential, and is intended only for the personal use of the individual or entity named above, and others who have been specifically authorized to receive it. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this transmission is strictly prohibited. If you have received this transmission in error, please notify the sender immediately by replying to this email and delete the original message and any attachments from your system. Thank you for your cooperation.

# Proof of Delivery

I hereby certify that on Wednesday, May 04, 2022, I provided a true and correct copy of the SDC Motion to Disallow MGC's Claims [Public Version] to the following:

Broadcaster Claimants Group, represented by John Stewart, served via E-Service at jstewart@crowell.com

Joint Sports Claimants, represented by Michael E Kientzle, served via E-Service at michael.kientzle@arnoldporter.com

American Society of Composers, Authors and Publishers (ASCAP), represented by Sam Mosenkis, served via E-Service at smosenkis@ascap.com

Major League Soccer, L.L.C., represented by Edward S. Hammerman, served via E-Service at ted@copyrightroyalties.com

Program Suppliers, represented by Lucy H Plovnick, served via E-Service at lhp@msk.com

SESAC Performing Rights, LLC, represented by John C. Beiter, served via E-Service at john@beiterlaw.com

Broadcast Music, Inc., represented by Jennifer T. Criss, served via E-Service at jennifer.criss@dbr.com

Global Music Rights, LLC, represented by Scott A Zebrak, served via E-Service at scott@oandzlaw.com

Multigroup Claimants, represented by Brian D Boydston, served via E-Service at brianb@ix.netcom.com

Signed: /s/ Michael A Warley